

**Video Deposition**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

- - -

Ru-El Sailor,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 1:20-CV-00660
	)	
The City of Cleveland, et al,	)	
	)	
Defendants.	)	

- - -

Videotaped deposition of Amy Catherine Sailor, a  
witness herein, called by the Defendants for oral  
examination, pursuant to the Federal Rules of Civil  
Procedure, taken before Mary Bolas-Dietz, Court  
Reporter and Notary Public in and for the State of  
Ohio, at the Law Offices of Hanna, Campbell & Powell,  
3737 Embassy Parkway, Suite 100, Akron, Ohio 44334, on  
Monday, July 1, 2024, commencing at 10:25 a.m.

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16 ALSO PRESENT

17 Matthew Aumann, Esq., City of Cleveland (Zoom)  
18 Elena Boop, Esq., City of Cleveland (Zoom)  
Jacqueline Greene, Esq., Friedman & Gilbert (Zoom)  
Abigail Calderone, Paralegal  
19 Steven Mengelkamp, Video Technician

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WITNESS:

CROSS

Amy Catherine Sailor

By Mr. Calderone

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**Video Deposition**

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1 PROCEEDINGS

2 THE VIDEOGRAPHER: We're on the  
3 record at 10:25. Today is July 1st, 2024. This  
4 is the deposition of Amy Sailor.

5 THE COURT REPORTER: Mrs. Sailor,  
6 please raise your right hand?

7 AMY CATHERINE SAILOR,  
8 of lawful age, being first duly sworn, as hereinafter  
9 certified, was examined and testified as follows:

10 CROSS-EXAMINATION

11 By Mr. Calderone:

12 Q Mrs. Sailor, my name is Ken Calderone and I'm  
13 representing some of the Defendants in the  
14 lawsuit that was filed by your husband. And  
15 I've already had the opportunity to speak with  
16 him and ask him questions. Today's my  
17 opportunity to speak to you. Have you ever been  
18 in a deposition like this before?

19 A No.

20 Q Well, I'm going to ask you questions. You're  
21 under oath, of course. You'll have to respond  
22 verbally to the questions that I ask, so the  
23 court reporter can take down everything that you  
24 and I say; do you understand that?

25 A Yes.

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1 Q If you don't understand a question, you can tell  
2 me you don't understand it and I'll be more than  
3 happy to try and rephrase the question for you,  
4 maybe even show you something that might help  
5 you answer the question. Do you understand  
6 that?

7 A Yes.

8 Q I'll caution you not to speak while I'm speaking  
9 or your attorney is speaking, because this young  
10 lady here can only take down one person speaking  
11 at a time; okay?

12 A Okay.

13 Q This is not a marathon. If you want to take a  
14 break at some point in time, just tell me you  
15 want to take a break. We may complete the  
16 question that has been posed to you or maybe ask  
17 a couple more questions to get to a convenient  
18 spot, but we will take a break when you need a  
19 break; okay?

20 A Okay.

21 Q With that, your current legal name is what?

22 A Amy Sailor.

23 Q And Amy, what's your middle name?

24 A Catherine.

25 Q Prior to going by the name of Amy Sailor, what

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1 name did you go by?

2 A Amy Gangloff Spence. And that's

3 G-a-n-g-l-o-f-f, S-p-e-n-c-e.

4 Q And have you been previously married?

5 A That was my former married last name, Spence.

6 Gangloff is my maiden name.

7 Q When were you married the first time?

8 A Oh, man, when was that? 2010.

9 Q Yeah, I won't hold you to exact dates.

10 A Okay.

11 Q Just tell me approximately.

12 A Around 2010.

13 Q All right. And who were you married to the  
14 first time?

15 A Edward Spence.

16 Q And did that marriage occur here in Ohio?

17 A No, we were married in Jamaica while we were  
18 living in Jamaica.

19 Q And approximately, how long were you married to  
20 Edward Spence?

21 A Oh, maybe five years.

22 Q Was Edward Spence from the Northeast Ohio area?

23 A He is from Jamaica, but we met in Ohio.

24 Q And after getting married in Jamaica, did the  
25 two of you live in Ohio?

**Video Deposition**

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1     A       No, we lived in Jamaica.

2     Q       So approximately, what years did you live in

3             Jamaica?

4     A       From 2010 to maybe 2012.

5     Q       Prior to being married to Mr. Spence, did you

6             live in the Northeast Ohio area?

7     A       Yes.

8     Q       Are you from the Northeast Ohio area?

9     A       Yes.

10    Q       Where did you grow up at?

11    A       In Cleveland.

12    Q       What is your date of birth?

13    A       4/29/82.

14    Q       Do you still have family in the Cleveland area?

15    A       Yes.

16    Q       What family do you have here?

17    A       I have my mom, my stepdad, two sisters, and a

18             brother, and then extended family.

19    Q       And are they all in Northeast Ohio area?

20    A       Yes.

21    Q       So if I understand correctly, you've lived in

22             the Northeast Ohio area for your whole life

23             except for that approximate four or five years

24             when you were in Jamaica?

25    A       Yes.

**Video Deposition**

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1 Q Why did you come back to Cleveland weather?

2 A It was depressing.

3 Q What have you done to prepare for your  
4 deposition today?

5 A I just talked with Sarah a little bit, talked to  
6 my husband about, you know, some of the things  
7 that might be mentioned or asked, not too much.

8 Q Is Ms. Gelsomino here acting as your attorney  
9 today?

10 A Well --

11 MS. GELSOMINO: Objection.

12 A -- technically, she's not my attorney, but she's  
13 my husband's attorney and she's here to guide  
14 me.

15 Q Okay. Before showing up here today, what did  
16 you and your husband talk about to prepare for  
17 the deposition?

18 MS. GELSOMINO: Objection.

19 A We didn't talk about it too much, just, you  
20 know, "You'll be fine. Don't be nervous, just  
21 tell the truth."

22 Q Okay.

23 A Yeah.

24 Q Did you have the opportunity to read the  
25 deposition transcript of Ru-El Sailor's



**Video Deposition**

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1 deposition?

2 A No.

3 Q What did you and Ms. Gelsomino talk about?

4 A Same thing, just, you know, "You'll be fine.  
5 You'll do great. It won't take too long if --  
6 you know, just answer the questions as they  
7 should be."

8 Q Have you looked at any documents to prepare for  
9 your deposition?

10 A No.

11 Q Have you listened or watched any videos and what  
12 I mean, videos, some of the depositions in this  
13 case have been videotaped like yours. Have you  
14 watched any videos?

15 A No.

16 Q Have you listened to any audio recordings of  
17 anything?

18 A No.

19 Q Presently, where do you live?

20 A In Euclid, Ohio.

21 Q And what's your address?

22 A 384 East 211th Street, Euclid 44123.

23 Q I'm sorry, 44?

24 A 123.

25 Q 123. And does Ru-El Sailor live there with you?

**Video Deposition**

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1 A Yes.

2 Q Who else lives there with you?

3 A My daughter, Paige Gangloff, my daughter, Mia

4 Spence, Olivia Spence, and Myel Sailor.

5 Q What was the last one?

6 A Myel, M-y-e-l, Sailor.

7 Q So I'm guessing that Paige is a child that you

8 had with Edward?

9 A No.

10 Q All right. Who is the father for Paige?

11 A Calvin Berry spelled with a K.

12 Q B-e-r-r-y?

13 A Yes.

14 Q And is Calvin still living in the Northeast Ohio

15 area?

16 A He is deceased.

17 Q Sorry about that. And how old is Paige?

18 A Twenty-two (22).

19 Q Mia Spence, who is the father of Mia Spence?

20 A Edward Spence.

21 Q And how old is Mia?

22 A Eighteen (18).

23 Q Olivia Spence, who is her father?

24 A Edward Spence.

25 Q And how old is Olivia?

**Video Deposition**

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1 A Thirteen (13).

2 Q And did you say Myel Sailor?

3 A Yep, yes.

4 Q And how old -- is it he or she?

5 A She, she's three.

6 Q She's three years old.

7 A I have pictures. No, I'm just kidding.

8 Q I'll look at them on a break. Ru-El is --

9 A Yes.

10 Q -- Myel's father; correct?

11 A Right.

12 Q You and Ru-El did not have Myel until after he

13 got out of prison?

14 A Right.

15 Q To your knowledge, does Ru-El Sailor have any

16 other children of his?

17 A Yes.

18 Q What children does he have?

19 A Tashanna Hammond is his stepdaughter and then

20 there is Elajia Sailor, Chantel Sailor, Chalaye

21 Sailor, Mikia Smith, and Milan Smith.

22 Q And now let's go through each of these.

23 Tashanna Hammond, you said that was his

24 stepdaughter?

25 A Uh-huh.

**Video Deposition**

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1 Q So Tashanna Hammond, to your knowledge, is not  
2 Ru-El's biological child?

3 A Right.

4 Q Do you know who Tashanna's mother or father is?

5 A Her mother is Leticia Fritz, Hammond Fritz  
6 maybe, and her dad is Edward -- Ed Fisher. I  
7 don't know if it's Ed or Edward.

8 Q Since Ru-El has been out of prison, how  
9 frequently has he seen Tashanna Hammond?

10 MS. GELSOMINO: Objection.

11 Q If -- if you know.

12 A Once a week.

13 Q So Tashanna lives in the Northeast Ohio area?

14 A Yes.

15 Q To your knowledge since Ru-El has been out of  
16 prison, how often has he seen Elajia Sailor?

17 A Same, once a week.

18 Q Since Ru-El has been out of prison, has Elajia  
19 lived with Ru-El?

20 A No.

21 Q Who does Elajia live with?

22 A With El -- with Ru-El's mom, Bernatte Brown.

23 Q Do you know how old Elajia is?

24 A She is 23.

25 Q To your knowledge, is Elajia dependent on Ru-El

**Video Deposition**

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1 on anyone else for financial support?

2 A No.

3 MS. GELSOMINO: Objection.

4 Q Chantel Sailor, do you know how old she is?

5 A Twenty-four (24).

6 Q And to your knowledge, how often does Ru-El see  
7 her?

8 A Same, about once a week.

9 Q She lives in the Northeast Ohio area?

10 A Yes.

11 Q And does she live with Bernatte Brown as well?

12 A Yes.

13 Q And to your knowledge is Chantel dependent on  
14 Ru-El for financial support in any way?

15 A No.

16 Q Chalaye Sailor, do you know how old she is?

17 A Twenty-three (23).

18 Q Is she a twin?

19 A No. Wait. Okay. Let's see, no, Laye-Laye is  
20 -- I'm trying to think, okay.

21 Q Let's do it this way --

22 A Okay.

23 Q -- between -- between Elajia, Chantel, and  
24 Chalaye, who is the oldest?

25 A It goes Tashanna [sic], Chantel, Laye-Laye --

**Video Deposition**

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1 Mikia and Milan are twins, so it's like 22, 23,  
2 24, something like that, and then the twins will  
3 be 21 in a couple days.

4 Q Okay. To your knowledge who does Chalaye live  
5 with?

6 A She lives on her own.

7 Q Is Bernatte Brown her mother?

8 A Her grandma. That's their grandma.

9 Q Grandma. Do you know who Chalaye's mother is?

10 A Leticia.

11 Q Leticia Brown?

12 A Fritz.

13 Q Okay. And to your knowledge how often does  
14 Ru-El see Chalaye?

15 A Maybe once a year. She's in the military.

16 Q Now Mikia and Milan Smith are twins?

17 A Uh-huh.

18 Q Approximately, how old are they?

19 A Twenty-one (21).

20 Q To your knowledge, how often does Ru-El see  
21 them?

22 A Once a week.

23 Q So they live in the Northeast Ohio --

24 A Right.

25 Q -- area; correct?

**Video Deposition**

15

1 A Yes.

2 Q And who did they stay with or where do they  
3 live?

4 A Milan lives in -- in Euclid with her grandma.  
5 Her grandma is Marilyn Amato.

6 Q Okay.

7 A And Mikia lives on her own in Willowick maybe.

8 Q To your knowledge, are any of these children  
9 that we just discussed of Ru-El's dependent upon  
10 him for financial support?

11 A I mean, he gives them money from time to time if  
12 they need it, but they're pretty much  
13 independent. They definitely ask.

14 Q I want to ask you briefly about your education.  
15 Have you graduated from high school?

16 A I have a GED.

17 Q And when did you obtain that?

18 A In --

19 Q Approximately.

20 A -- 2015 maybe.

21 Q Did you obtain that before Ru-El got out of  
22 prison?

23 A Yes.

24 Q Other than the GED, do you have any other  
25 certifications in a particular trade or degrees?

**Video Deposition**

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1 A No.

2 Q Have you ever been a member of any unions?

3 A No.

4 Q To your knowledge, what is Ru-El's highest level  
5 of education?

6 A GED.

7 Q Since he's been out of prison to your knowledge  
8 has he obtained any certifications in any  
9 particular trade?

10 A No.

11 Q And to your knowledge since he's been out of  
12 prison, has Ru-El worked -- went to school or  
13 earned any degrees?

14 A No.

15 Q Are you currently employed?

16 A Yes.

17 Q Where are you currently employed at?

18 A I work for the Recycling Industries Operating  
19 Standard, RIOS.

20 Q Recycling Industries?

21 A Operating Standard. It is a subsidy of IROS,  
22 the Industrial Recycling Operating Standard.

23 Q Okay. So what is that business?

24 A We certify industrial recyclers. So it's  
25 basically like the ISO or HIPAA of industrial



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1 recycling. Per the Government, they have to be  
2 certified in order to distribute or receive  
3 recycled materials. And I manage the membership  
4 department.

5 Q All right. So when you say you manage the  
6 membership department, what does that mean?  
7 What do you do on a day-to-day basis?

8 A I facilitate audits through a third party  
9 certification body and the facilities. I  
10 provide membership certificates, take membership  
11 payments, schedule training webinars, things  
12 like that.

13 Q And is this the job that you go to an office to  
14 work at or do you work from home or is it  
15 hybrid?

16 A No, I work from home. My company is based in  
17 Washington, D.C.

18 Q Who do you report to at RIOS?

19 A His name is Rike Sandler, R-i-k-e.

20 Q How long have you worked at RIOS?

21 A Since 2019.

22 Q And that's a full-time job?

23 A Yes.

24 Q And I'm imagining you get benefits through RIOS?

25 A Yes.

**Video Deposition**

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1 Q Prior to working at RIOS, where did you work?

2 A I worked for S.G. Morris.

3 Q And where is S.G. Morris located?

4 A Highland Heights.

5 Q What did you do for S.G. Morris?

6 A Just data entry.

7 Q Was that a job where you worked at home to do or  
8 did you go to an office?

9 A An office.

10 Q And that was in the Highland Heights office?

11 A Yes.

12 Q Who did you report to at S.G. Morris?

13 A Oh, man, I just remember his name being Paul. I  
14 can't remember his last name.

15 Q How long approximately did you work for S.G.  
16 Morris?

17 A Oh, like two or three years.

18 Q And why did you leave S.G. Morris?

19 A For RIOS.

20 Q Better job and you could --

21 A Yeah.

22 Q -- work for home -- work from home?

23 A Yeah, uh-huh.

24 Q Prior to working in S.G. Morris, where did you  
25 work?

**Video Deposition**

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1 A I worked for Safeguard Properties which was a  
2 property management company.

3 Q Where is or was Safeguard Properties located?

4 A It was located in Mentor, Ohio.

5 Q Do you remember the road?

6 A It might have been Mentor Avenue. I don't  
7 remember, Heisley maybe. I don't know.

8 Q Fair enough. Approximately, how long did you  
9 work at Safeguard?

10 A Oh, maybe three years.

11 Q And what did you at Safeguard?

12 A Same, like data entry.

13 Q Did you work at the office or did you work from  
14 home?

15 A Both.

16 Q It was a hybrid?

17 A Yep.

18 Q Why did you leave Safeguard?

19 A For S.G.M. or S.G. Morris.

20 Q Better job, more money. So if I understand  
21 correctly, you probably worked for Safeguard  
22 Properties approximately that 2015/2016 to 2019  
23 time period?

24 A No, I -- I probably have the years wrong as far  
25 as how long I worked at each of those jobs, but

**Video Deposition**

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1 I know that I started Safeguard Properties in  
2 2012.

3 Q And again, I won't hold you to exact dates or  
4 time periods. Your best estimate right now is  
5 you worked there approximately three years?

6 A Yeah.

7 Q And --

8 A Three or four years.

9 Q But when you left Safeguard, you went directly  
10 to S.G. Morris?

11 A Yes.

12 Q Let me ask you about Ru-El right now. To your  
13 knowledge, is Ru-El employed now?

14 A Yes.

15 Q Where is he employed at?

16 A He owns Comma Club Clothing.

17 Q And I believe he started Comma Club soon after  
18 he got out of prison; right?

19 A Right.

20 Q Does he have any other individuals that own the  
21 business with him?

22 A No.

23 Q It's just him. And where does his business or  
24 strike that. Where is his business located at?

25 A 589 East 185th Street, Euclid, 44119.

**Video Deposition**

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1 Q How long has he been doing business at that  
2 location?

3 MS. GELSOMINO: Objection.

4 Q Strike that. To the best of your knowledge, how  
5 long has he been doing business at that  
6 location?

7 A About four years.

8 Q Since he has started that business, Comma Club,  
9 to your knowledge what different locations has  
10 he run his business at?

11 A Well, he started off selling Comma Club hand to  
12 hand and he's only been in a physical location  
13 since 2020.

14 Q And to your knowledge, how is his business  
15 going?

16 A Good.

17 Q Has -- to your knowledge, has the business been  
18 fairly stable for the last four years?

19 MS. GELSOMINO: Objection.

20 A It's been stable. We have our ups and downs.  
21 There's -- you know, we've tried to pinpoint  
22 certain months of the year where it gets slow  
23 and then picks back up. So, you know, we do  
24 have slow seasons and then times where things  
25 pick up.

**Video Deposition**

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1 Q Other than running the Comma Club business, to  
2 your knowledge does Ru-El have any other jobs?

3 A No.

4 Q Since he's been out of prison, to your  
5 knowledge, has Ru-El had any other jobs?

6 A Well, technically, we have a nonprofit agency,  
7 but we haven't really done too much with it  
8 other than some community outreach throughout  
9 the year, turkey drives and things like that,  
10 school giveaways, but I don't know if you would  
11 really consider that a job.

12 Q All right. Well, tell me about the nonprofit.  
13 Does the nonprofit have a name?

14 A It is Comma Club Community.

15 Q What is your understanding of the purpose of  
16 that nonprofit organization?

17 A For general community outreach.

18 Q Outreach for what?

19 A Giving back, giving back to children, families  
20 in need.

21 Q And is there anyone else that is involved in  
22 managing the nonprofit organization other than  
23 Ru-El?

24 A Me.

25 Q Do you and Ru-El have a particular title, like

**Video Deposition**

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1 an officer, president, vice-president, anything  
2 like that?

3 A It is on paper, but I don't know off the top of  
4 my head what exactly our titles are.

5 Q Other than you and Ru-El, are there any other  
6 people that are involved in the management or  
7 operation of that nonprofit organization?

8 A No.

9 Q Are you involved in any way in helping Ru-El run  
10 his Comma Club business?

11 A Yes.

12 Q What do you do for the business?

13 A I help with placing orders, scheduling payroll,  
14 production, general store upkeep.

15 Q Currently, how many employees does Comma Club  
16 have to your knowledge?

17 A One.

18 Q And who's that one employee?

19 A Mia Spence.

20 Q That's Ru-El's daughter?

21 A Yes. Well, my daughter, my daughter.

22 Q I'm sorry.

23 A Her step -- his stepdaughter, yeah.

24 Q I'm sorry.

25 A Uh-huh, they're all our kids.

**Video Deposition**

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1 Q To your knowledge, since Ru-El started the Comma  
2 Club business, what's the highest number of  
3 employees that Comma Club has had over the last  
4 five, six years?

5 A No more than two at a time.

6 Q Does Comma Club actually manufacture and make  
7 their clothing?

8 A Not the actual fabric, but the logos and things  
9 like that we do have and we outsource.

10 Q So if I understand, you may order shirts,  
11 certain items of clothing already made, but then  
12 you add logos and things to those clothing?

13 A Right.

14 Q And then those items of clothing, are they  
15 packaged in any way or are they sold off the  
16 rack?

17 A Both.

18 Q I'm sure you have in front of you your cell  
19 phone today.

20 A Right.

21 Q What is your cell phone number?

22 A 216-702-3313.

23 Q And if I understand correctly, that has been  
24 your cell phone number for a number of years?

25 A Yes.



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1 Q Who is the cell phone service provider?  
2 A AT&T.  
3 Q And the name on the account, is it yours -- your  
4 name?  
5 A It's either my mom or stepdad. I'm not 100  
6 percent sure. I think my mom, Catherine Kalish.  
7 Q Katherine with a K?  
8 A C.  
9 Q C and Kalish?  
10 A With a K, Kalish?  
11 Q And what's your stepfather's name?  
12 A David Kalish.  
13 Q K-i -- K-a-l-i-s-h?  
14 A Right.  
15 Q Where do they live at?  
16 A 18313 East Park Drive, Cleveland, 44119.  
17 Q Do you have an e-mail address that you use?  
18 A Yes.  
19 Q What is that?  
20 A Amysailorcc@gmail.com.  
21 Q How long has that been your e-mail?  
22 A Only for about a year.  
23 Q Prior to that, what e-mail did you use?  
24 A Paige, p-a-i-g-e, 292@yahoo.com.  
25 Q Any other e-mail addresses that you've used for

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1 say the last ten or 15 years?

2 MS. GELSOMINO: Objection.

3 Q If you remember.

4 A No, I don't remember.

5 Q Other than the 216-702-3313 number, have you had  
6 any other cell phone numbers that you have used  
7 over say the last five or ten years?

8 MS. GELSOMINO: Objection.

9 A Over -- under ten years, yeah, but I don't  
10 remember the number.

11 Q The other cell phones that you did use, who were  
12 the service providers?

13 A Sprint, maybe AT&T.

14 Q And those other phones that you've used, do you  
15 know whose name is on the account?

16 A Sprint was in my name and AT&T's always been in  
17 my mom's name.

18 Q Catherine Kalish's name?

19 A Right.

20 Q What is, if you know, Ru-El Sailor's current  
21 cell phone?

22 A 216-659-6825.

23 Q 6825?

24 A Right.

25 Q And to your knowledge, approximately how long

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1 has Ru-El had that number?

2 A Six years.

3 Q Do you know who the service provider is?

4 A I think it's T-Mobile.

5 Q And is Ru-El's name on the account?

6 A No.

7 Q Whose name is on the account?

8 A Sharell Robinson.

9 Q You have to spell that one for me.

10 A S-h-a-r-e-l-l.

11 Q Who is Sharell Robinson?

12 A Ru-El's sister.

13 Q Do you know where she lives?

14 A She lives in South Euclid on Lowden, but I don't  
15 know the address.

16 Q Lowden, L-o-d --

17 A L-o-w-d-e-n.

18 Q Do you and Ru-El have a joint bank account?

19 A No.

20 Q Do you know what bank Ru-El does his banking at?

21 MS. GELSOMINO: Objection.

22 A Yes.

23 Q What bank is that?

24 A Bank of America and Navy Federal.

25 Q Bank of America and what?

**Video Deposition**

28

1 A Navy Federal.

2 Q Navy?

3 A Federal.

4 Q Federal. What branch offices does he use to  
5 your knowledge?

6 MS. GELSOMINO: Objection.

7 A Bank of America, his home office is in Mayfield,  
8 and Navy Federal I think is Downtown.

9 Q Downtown Cleveland?

10 A Right.

11 Q Do you and Ru-El file joint tax returns?

12 MS. GELSOMINO: Objection.

13 A How did we -- no, uh-uh, we don't. We don't  
14 file joint.

15 Q To your knowledge, does Ru-El have anybody help  
16 him with his income tax taxes?

17 MS. GELSOMINO: Objection.

18 A No.

19 Q He does them himself --

20 A Well --

21 Q -- if you know?

22 A I'm not sure.

23 Q Amy, have you ever been arrested before?

24 MS. GELSOMINO: Objection.

25 A Yes.

**Video Deposition**

29

1 Q Have you ever been convicted of anything?

2 MS. GELSOMINO: Objection.

3 A Yes.

4 Q What have you been convicted of?

5 MS. GELSOMINO: Objection.

6 A Vandalism.

7 Q Anything else?

8 A No.

9 Q When was that approximately?

10 MS. GELSOMINO: Objection.

11 A 2003.

12 Q Where was that conviction at?

13 A Cleveland.

14 MS. GELSOMINO: Objection to all  
15 these questions.

16 MR. CALDERONE: Yeah, we can have  
17 a standing.

18 MS. GELSOMINO: You can still  
19 answer?

20 THE WITNESS: Oh, okay.

21 MS. GELSOMINO: -- to the best of  
22 your ability.

23 Q Go ahead.

24 A What was that?

25 Q Where was the conviction at?

**Video Deposition**

30

1 A Cleveland.

2 Q And was it Cleveland Municipal Court, if you  
3 remember?

4 A Oh, yeah, I don't know.

5 Q To your knowledge, since you and Ru-El have been  
6 married, has he been arrested or convicted of  
7 anything?

8 A No.

9 MS. GELSOMINO: Objection.

10 A Not to my knowledge.

11 Q Prior to this case, have you ever been involved  
12 in a lawsuit in any way?

13 MS. GELSOMINO: Objection.

14 A No, I don't think so. No, I've never been sued  
15 or sued anyone, no.

16 Q I want to ask you about your relationship with  
17 Ru-El Sailor. How did you first meet Ru-El?

18 A Well, we went to the same high school and my  
19 best friend lived down the street from where he  
20 grew up.

21 Q What best friend was that?

22 A Marshelle Goodgame.

23 Q Marshelle Goodgame?

24 A Uh-huh.

25 Q Does she still live in the area, if you know?

**Video Deposition**

31

1 A I don't know where she lives.

2 Q Were you and Ru-El friends before his conviction  
3 in 1991?

4 A Yes. Oh, '91?

5 Q Wait, 2003. I'm sorry, I got cases confused for  
6 a moment.

7 A Yeah.

8 Q Before his conviction in 2003, were you and  
9 Ru-El friends?

10 A Yes.

11 Q How often did you see Ru-El before he was  
12 convicted?

13 MS. GELSOMINO: Objection.

14 A Not very often, just around the neighborhood,  
15 driving by maybe, passing through.

16 Q Have you and Ru-El ever dated before or been a  
17 couple before his conviction?

18 A Yeah, something like that, yeah.

19 Q That was kind of vague. Help me, what --  
20 explain to me your relationship with Ru-El  
21 before he was convicted.

22 A We weren't technically dating, but we saw each  
23 other.

24 Q All right. So if you weren't technically dating  
25 but you saw each other, explain to me what

**Video Deposition**

32

1           setting --

2     A       Okay. Well, we -- I guess you could say we were  
3           -- we were dating, but we weren't technically in  
4           a relationship, yeah, uh-huh.

5     Q       Before his conviction, how frequently did you  
6           and Ru-El go on dates?

7     A       Maybe once a month over the years.

8     Q       And I may have asked you this before, but before  
9           Ru-El's conviction, did you and he have any  
10          other children together?

11    A       No.

12    Q       At the time of Ru-El's conviction -- strike  
13          that. Prior to Ru-El's conviction, did you and  
14          he ever live together?

15    A       No.

16    Q       At the time of his conviction in 2003, was the  
17          status of your relationship with him the status  
18          that you're describing to me where you and he  
19          may go out maybe once a month?

20                   MS. GELSOMINO:           Objection.

21    A       You said before he went to prison?

22    Q       Yes.

23    A       Well, it was over the course of a few years we  
24          would, you know, see each other on and off and  
25          then lose contact for a little while or just



**Video Deposition**

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1           remain friends, but I think I probably dated him  
2           maybe a year before he went to prison or a year  
3           before, not for a year.

4   Q       Correct. So during that year before he went to  
5           prison, how frequently did you see him?

6   A       Maybe once a month.

7   Q       And before his conviction, and I don't mean to  
8           pry and I'll be as polite and professional as I  
9           can, before his conviction, have you and he ever  
10          been intimate?

11                   MS. GELSOMINO:           Objection, no.  
12           Objection.

13                   MR. CALDERONE:           Your objection is  
14           what?

15                   MS. GELSOMINO:           That's completely  
16           irrelevant and really invasive and harassing. Is  
17           that really a necessary question for you in this  
18           case, Ken? They were dating. They spent time  
19           together. I'm not sure how much more you need  
20           than that.

21                   MR. CALDERONE:           Well, just that  
22           question. I'm not going to ask any more about  
23           it. It goes --

24                   MS. GELSOMINO:           All right. I --

25                   MR. CALDERONE:           -- to how close

**Video Deposition**

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1           they were. That's all.

2                       MS. GELSOMINO:           Does it though?

3                       MR. CALDERONE:           I think that's a  
4           pretty close thing.

5                       MS. GELSOMINO:           I'm going to  
6           object. If you are comfortable answering that  
7           question, you're welcome to.

8   A       We were.

9   Q       Okay. Prior to Ru-El's conviction to your  
10       knowledge, was he ever involved in any gangs?

11   A       No.

12   Q       Prior to Ru-El's conviction, did you know if he  
13       had ever been convicted of any crimes before the  
14       murder conviction?

15   A       Yes.

16   Q       What crimes were you aware of that he had been  
17       convicted of before his murder conviction?

18   A       A drug charge.

19   Q       Prior to Ru-El's conviction in 2003 for murder,  
20       to your knowledge was he involved in any social  
21       organizations or clubs?

22   A       No.

23   Q       Prior to his murder conviction in 2003, did  
24       Ru-El have a job to your knowledge?

25   A       Well, Ru-El and Cordell were in the process of

**Video Deposition**

35

1 opening up a record store. So their job was  
2 renovating and organizing opening their own  
3 business.

4 Q If I recall Ru-El's testimony though, they  
5 didn't really get that business up and running  
6 prior to his conviction; is that correct?

7 MS. GELSOMINO: Objection.

8 A I'm not sure.

9 Q Other than this record business that he and  
10 Cordell were involved in one way or the other,  
11 are you aware of any other jobs that Ru-El  
12 Sailor held before his murder conviction in  
13 2003?

14 A I'm not aware of any other jobs.

15 Q Prior to his conviction for murder in 2003, to  
16 your knowledge, did Ru-El smoke marijuana?

17 A To my knowledge, I -- I think he did, yes.

18 Q And what is your recollection of how frequently  
19 he smoked it prior to the conviction?

20 MS. GELSOMINO: Objection.

21 A I don't know. I didn't spend enough time with  
22 him.

23 Q Prior to his conviction for murder in 2003, to  
24 your knowledge, did Ru-El drink alcohol?

25 MS. GELSOMINO: Objection.

**Video Deposition**

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1 A Yeah, I think he did.

2 Q And what is your recollection as to how  
3 frequently he drank alcohol during the time  
4 period before his conviction of murder?

5 MS. GELSOMINO: Objection.

6 A Maybe a few times a week if he went out.

7 Q Prior to Ru-El's conviction for murder in 2003,  
8 to your knowledge, did he ever use cocaine?

9 A No.

10 MS. GELSOMINO: Objection.

11 Q Prior to Ru-El's conviction for murder in 2003,  
12 to your knowledge, did he own a gun?

13 MS. GELSOMINO: Objection.

14 A Not to my knowledge.

15 Q Ru-El told me about different friends that he's  
16 had over the years. I want to ask you some  
17 questions about those friends to see what your  
18 knowledge is of those friends; okay?

19 First, the most commonly referred to name  
20 is Cordell Hubbard.

21 A Uh-huh.

22 Q Do you know Cordell Hubbard?

23 A Yes.

24 Q How long have you known Cordell Hubbard?

25 A Well, I probably met him around the same time I

**Video Deposition**

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1 met Ru-El, so maybe in '98 or '99.

2 Q So you knew Cordell, at least, for a few years  
3 before the murder conviction in 2003; correct?

4 A Right.

5 Q And how is it that you came to know Cordell  
6 Hubbard?

7 MS. GELSOMINO: Objection.

8 A Just mutual friends.

9 Q Did Ru-El introduce you to him or did somebody  
10 else introduce you to him?

11 A It was probably Marshelle Goodgame.

12 Q And describe for me if you would what  
13 relationship you had with Cordell Hubbard prior  
14 to the murder conviction in 2003.

15 A No relationship. I wouldn't even have  
16 considered him a friend. He was just someone  
17 that I knew.

18 Q You told me earlier that prior to the murder  
19 conviction, you and Ru-El did go out on dates.  
20 On any of the times when you were with Ru-El  
21 before the murder convictions, did you ever  
22 socialize when Cordell Hubbard was present?

23 MS. GELSOMINO: Objection.

24 Q If you recall.

25 A No, I don't remember.

**Video Deposition**

38

1 Q When was the last time that you spoke to Cordell  
2 Hubbard?

3 A Oh, man, it's -- it's been years. Maybe --  
4 maybe four years we -- I actually think we spoke  
5 in-person. We went to an event at the prison he  
6 was located at the time.

7 Q Is this after Ru-El got out of prison?

8 A Yes.

9 Q Since Ru-El has been out of prison, how many  
10 times have you been on a visit to see Cordell  
11 Hubbard in prison?

12 MS. GELSOMINO: Objection.

13 A Never.

14 Q I -- I thought you said you went to a prison  
15 event.

16 A Well, it was an event. It wasn't a visit to see  
17 Cordell. It was a toastmasters event I think  
18 and we were invited to speak.

19 Q Okay. Did you see Cordell at that event?

20 A Yes.

21 Q Did you get a chance to talk to him?

22 A Just a "Hi. How are you?" That's it.

23 Q How many times have you been to a prison event  
24 since Ru-El's been out of prison?

25 MS. GELSOMINO: Objection.

**Video Deposition**

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1 A Just that once.

2 Q And where did that take place?

3 A I can't remember if it was Mansfield. I'm not  
4 sure. I don't remember.

5 Q Do you know Nichole Hubbard?

6 A Not personally.

7 Q Prior to the murder conviction in 2003, did you  
8 ever talk to Nichole Hubbard?

9 A No.

10 Q Do you know Anthony McKenzie?

11 A Yes.

12 Q I believe his nickname is "Big Ant"?

13 A Uh-huh.

14 Q Do you know how that came to be?

15 A He's a --

16 MS. GELSOMINO: Objection.

17 A -- big guy.

18 Q Okay. Prior to the murder conviction in 2003,  
19 did you ever speak to or see Anthony McKenzie?

20 A Yes.

21 Q If you would, explain to me your relationship  
22 with him or how frequently you saw him back  
23 during that time period.

24 MS. GELSOMINO: Objection.

25 A Same as Cordell, just -- I just knew him. We

**Video Deposition**

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1           weren't technically friends. He was just  
2           someone that I knew, someone that I would see  
3           out, someone, you know, from the neighborhood,  
4           you know, where I hung out at with other  
5           friends.

6    Q       Prior to the murder conviction in 2003, did you  
7           know that Anthony McKenzie was a good friend of  
8           Ru-El Sailor's?

9    A       I knew they were friends.

10   Q       And before the murder conviction in 2003, you  
11           knew that Cordell Hubbard was a good friend of  
12           Ru-El's?

13   A       Yep, I knew they were friends.

14   Q       When was the last time you spoke to Anthony  
15           McKenzie?

16   A       I saw him recently and just -- we just hugged  
17           "hello" and that's it. We don't have any  
18           in-depth conversations.

19   Q       During the time period when Ru-El Sailor was  
20           incarcerated after his murder conviction in  
21           2003, did you communicate with Anthony McKenzie?

22                   MS. GELSOMINO:           Objection.

23   A       Only if I saw him out and about just a "hi" and  
24           "bye". That's it.

25   Q       Do you know Bobbie Nettles?



**Video Deposition**

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1 A Yes.

2 Q How do you know Bobbie Nettles?

3 A Same, just mutual friends through the  
4 neighborhood.

5 Q Prior to Ru-El's conviction in 2003, did you  
6 know that Bobbie Nettles was a close friend of  
7 Ru-El's?

8 MS. GELSOMINO: Objection.

9 A I don't -- they were friends. I just knew they  
10 were friends.

11 Q I've seen some things in -- in my file  
12 suggesting Bobbie's name -- nickname is  
13 "Foots"?

14 A Yeah.

15 Q Do you know how he got that nickname?

16 A No, and I -- I hardly ever hear anyone call him  
17 that so.

18 Q Prior to Ru-El's conviction in 2003, how  
19 frequently did you talk to Bobbie Nettles?

20 A I don't think we've ever spoken, maybe just  
21 seeing him out, maybe a "hi, bye."

22 Q During the time period of Ru-El Sailor's  
23 conviction for the murder in 2003, did you ever  
24 communicate with Bobbie Nettles?

25 A You said during?

**Video Deposition**

42

1 Q During Ru-El's incarceration, did you ever  
2 communicate with Bobbie Nettles?

3 A Did I ever? Probably, I probably made a  
4 three-way phone call for El, so that he could  
5 talk to Bobbie, but I don't think I ever like  
6 saw him out.

7 Q Do you remember the substance of any three-way  
8 conversations you had with Bobbie Nettles and  
9 Ru-El Sailor?

10 MS. GELSOMINO: Objection.

11 A It was always just, "What's going on? What's  
12 everyone up to? You know, what's happening in  
13 -- in the neighborhood" and things like that,  
14 family, friends.

15 Q William Sizemore, do you know William Sizemore?

16 A I know of him, yes.

17 Q Prior to Ru-El's conviction in 2003, did you  
18 know who William Sizemore was?

19 A No.

20 Q I'm guessing then prior to Ru-El's conviction in  
21 2003, you never spoke to William Sizemore?

22 A Right.

23 Q How did you come to know who -- who William  
24 Sizemore was?

25 A Ru-El told me who he was.

**Video Deposition**

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1 Q And when did Ru-El tell you who he was?

2 A Probably in our first conversation in 2013.

3 Q All right. Before Ru-El's conviction for murder  
4 in 2003, did Ru-El ever tell you who William  
5 Sizemore was?

6 A No.

7 Q You mentioned your first conversation in 2013.  
8 Can you explain to me what that conversation  
9 was?

10 A That was when Ru-El and I reconnected. He had a  
11 cell phone while he was in prison and we  
12 exchanged numbers through a friend and that  
13 night we spoke and we were on the phone for  
14 hours.

15 So I -- I asked him to, you know, tell me  
16 what -- what exactly happened why he was in  
17 prison, you know, aside from what I knew street  
18 rumors were.

19 Q Okay. Hold that, we'll get back to that  
20 conversation. Do you know who Ronald Snipe is?

21 A No.

22 Q To your knowledge, have you ever spoken to  
23 Ronald Snipe?

24 A No.

25 Q Do you know who Samuel Brown is?

**Video Deposition**

44

1 A No.

2 Q Do you know who Umar Clark is?

3 A Yes.

4 Q How do you know who Umar Clark is?

5 A I know him to be involved in El's case and I met  
6 him through El.

7 Q Prior to Ru-El's conviction in 2003, had you  
8 ever spoken to Umar Clark?

9 A No.

10 Q Do you know -- strike that. Prior to Ru-El's  
11 conviction in 2003, did you know who Umar Clark,  
12 Junior was?

13 A No.

14 Q As you sit here today though, you know who Umar  
15 Clark, Junior is?

16 A Yes.

17 Q And I believe he's got a nickname that some  
18 people call him "Man Man"?

19 A Uh-huh.

20 Q Yes?

21 A Yes.

22 Q Do you know how he got that nickname?

23 A No.

24 Q When did you first learn about who Umar Clark,  
25 Junior was?

**Video Deposition**

45

1 A Probably the first time that I spoke to El.

2 Q And have you ever spoken to Umar Clark, Junior  
3 yourself?

4 A Yes.

5 Q When was the last time you spoke to him  
6 yourself?

7 A It's been years, yeah, maybe -- maybe three  
8 years.

9 Q During the time period of Ru-El's incarceration,  
10 did you ever contact Umar Clark, Junior?

11 A No, uh-uh.

12 Q Do you remember the substance of any  
13 conversations you had with Umar Clark, Junior?

14 MS. GELSOMINO: Objection.

15 A No, nothing serious, just, "Hey, how's it going?  
16 What's going on out here?" Oh, and I -- I  
17 became friends with his mom so, you know,  
18 sometimes he would have me call his mom on  
19 three-way and things like that, but...

20 Q What is his mom's name?

21 A Nee-Nee -- I don't -- Anitra Brown, yeah.

22 Q Anitra Brown.

23 A Is it Anitra Brown? I don't know. It's Anitra,  
24 but we call her Nee-Nee.

25 Q When was the last time you spoke to Umar Clark?

**Video Deposition**

46

1 A Probably in 2018 the day that El was exonerated.

2 Q During the time period of Ru-El's incarceration,  
3 did you ever have any conversations with Umar  
4 Clark?

5 A You said prior to El's incarceration?

6 Q No. During Ru-El's --

7 A Oh, during.

8 Q -- incarceration, did you have conversations  
9 with Umar Clark?

10 A Yes.

11 Q And what were the substance of those  
12 conversations?

13 MS. GELSOMINO: Objection.

14 A I would ask him his involvement with the case  
15 and the investigation. He told me what he knew  
16 of the crime and what his thoughts were on El's  
17 position in the case.

18 Q And what do you recall his position being on  
19 Ru-El's conviction?

20 MS. GELSOMINO: Objection.

21 A He told me that he knew El was innocent. He  
22 knew that William Sizemore was really there that  
23 night with Cordell and that El wasn't involved.  
24 And he was, you know, going to try to help with  
25 El's exoneration.

**Video Deposition**

47

1 Q I saw a name of another individual and I don't  
2 know how to pronounce it, Bennett -- Bennut?

3 A Bennett?

4 Q Do you know someone --

5 A Do you have a -- a first name?

6 Q I don't believe I do at the moment.

7 A Just Bennett, no, I don't know.

8 Q Bennett or Bennut (changes pronunciation)?

9 A Oh, no, uh-uh. I was going to say Bernatte, but  
10 no, that's his mom.

11 Q Maybe that's it, Bernatte?

12 A Bernatte, uh-huh.

13 Q Who is Bernatte?

14 A El's mom.

15 Q To your knowledge, when was the last time that  
16 Ru-El spoke to Anthony McKenzie?

17 A Recently.

18 Q And to your knowledge, how frequently does Ru-El  
19 communicate with Anthony Mckenzie?

20 MS. GELSOMINO: Objection.

21 A Probably a couple times a month.

22 Q To your knowledge, they still remain friends  
23 today?

24 A Yeah, uh-huh.

25 Q To your knowledge, does Ru-El and Anthony, you

**Video Deposition**

48

1 know, go out and socialize together?

2 MS. GELSOMINO: Objection.

3 A They don't go out together, but they do see each  
4 other out and Anthony shops at Comma Club, so  
5 they see each other there.

6 Q To your knowledge when was the last time Ru-El  
7 either saw or spoke to Bobbie Nettles?

8 A Recently.

9 Q What is your recollection of when they last  
10 either spoke or communicated?

11 MS. GELSOMINO: Objection.

12 A When?

13 Q Yes.

14 A Saturday.

15 Q And what -- explain that communication.

16 MS. GELSOMINO: Objection.

17 A I -- we had a graduation party for my daughter.  
18 We have an event space next to Comma Club. He  
19 was in Comma Club and then came to the event  
20 space for the graduation party.

21 Q To your knowledge, how frequently did Bobbie  
22 Nettles and Ru-El stay in contact with each  
23 other?

24 MS. GELSOMINO: Objection.

25 A Maybe a few times a month.



**Video Deposition**

49

1 Q Did they go out together?

2 A No.

3 Q To your knowledge, when was the last time Ru-El  
4 communicated with William Sizemore?

5 A I have no idea.

6 Q To your knowledge mwhen was the last time Ru-El  
7 communicated with Umar Clark?

8 A I don't know.

9 Q To your knowledgem when was the last time Ru-El  
10 communicated with Umar Clark, Junior?

11 A I don't know.

12 Q Do you know who Clark Lamar Williams is?

13 A I know of him.

14 Q I think his nickname was "Dude"?

15 A Uh-huh.

16 Q Prior to Ru-El's conviction, did you ever speak  
17 to Clark Lamar Williams?

18 A No.

19 Q After Ru-El's conviction, did you ever speak  
20 with Clark Lamar Williams?

21 A No.

22 Q You know who Larry Braxton is; correct?

23 A Yes.

24 Q Prior to Ru-El's conviction, did you ever speak  
25 to Larry Braxton?

**Video Deposition**

50

1 A No.

2 Q During Ru-El's incarceration, did you ever speak  
3 directly to Larry Braxton?

4 A Yes.

5 Q How many times?

6 A Well, I spoke to him on the phone a few times  
7 and we met in-person I think twice.

8 Q And what were the substance of those  
9 conversations?

10 MS. GELSOMINO: Objection.

11 A About El's case and his role in the case.

12 Q And tell me about those conversations; what did  
13 you specifically talk about in the case?

14 MS. GELSOMINO: Objection.

15 A Well, I -- when I told him who I was and asked  
16 him if we could meet, I -- I went to his house  
17 on Englewood and I asked him, you know, what  
18 happened that night, you know, according to his  
19 memory.

20 And then I explained, you know, who El was  
21 and what his involvement was in the case and  
22 explained, you know, his family, his character,  
23 talked about his kids. Larry -- Larry told me  
24 that he made a mistake and he wanted to come  
25 forward and do the right thing.

**Video Deposition**

51

1           He said that he didn't want an innocent  
2           man to sit in prison. He didn't want any man to  
3           sit in prison for that long, let alone an  
4           innocent man.

5   Q       Any other communications you recall having with  
6           Mr. Braxton?

7   A       He has called my phone recently. He -- he  
8           didn't -- he would hang up. It would ring. He  
9           would hang up. And when I would call back, it  
10          would go straight to voicemail.

11          So I -- I texted the number to see who it  
12          was and didn't get a response, so I reversed  
13          search the number and realized that it was  
14          Larry.

15   Q       And you said recently. Give me your estimate of  
16          when that was?

17   A       Well, it was months before he gave a deposition  
18          and it was on the day of his deposition.

19   Q       Did you talk to him on the day of his  
20          deposition?

21   A       No.

22   Q       Did you talk to him before his deposition?

23   A       No.

24   Q       Have you talked to him since his deposition?

25   A       No.

**Video Deposition**

52

1 Q To your knowledge, when was the last time Ru-El  
2 spoke to Braxton?

3 MS. GELSOMINO: Objection.

4 A I know that they've seen each other in public  
5 once or twice. El didn't even know who he was  
6 until Larry approached him.

7 Q You don't know though the substance of those  
8 conversations?

9 A I know the first time they spoke, it was Larry  
10 walked up to El in a Walmart and introduced  
11 himself. They shook hands. And -- and El  
12 didn't realize who he was at first until Larry,  
13 you know, explained who he was and Larry  
14 apologized and I don't know. I don't remember.

15 Q Any other knowledge you have of conversations  
16 Ru-El had with Larry Braxton?

17 A I don't remember.

18 Q In your communications with Larry Braxton, did  
19 you ever text him?

20 A Yes.

21 Q Do you still have those text messages?

22 A No.

23 Q Did you ever send him e-mails?

24 A No.

25 Q Did you ever send him letters?

**Video Deposition**

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1 A No.

2 Q Did you ever meet with Mr. Braxton to show him  
3 any documents?

4 A No.

5 Q To your knowledge other than you and Ru-El, has  
6 there been anyone else that you know of that has  
7 spoken to Mr. Braxton about Ru-El?

8 MS. GELSOMINO: Objection.

9 A Attorneys and private investigators.

10 Q And what attorneys do you know of that have  
11 spoken to Braxton?

12 A Kimberly Kendall.

13 Q And Kimberly Kendall was one of Ru-El's  
14 attorneys?

15 A Yes.

16 Q What do you know about Kimberly Kendall's  
17 communications with Larry Braxton?

18 MS. GELSOMINO: Objection.

19 A She went to get an affidavit from Larry when he  
20 said he made a mistake and he wanted to come  
21 forward and do the right thing.

22 Q And to your knowledge, did Larry Braxton ever  
23 sign any such affidavit?

24 A I don't know if he signed it. I would assume  
25 so.

**Video Deposition**

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1 Q You don't know?

2 A No.

3 Q Any other communications you're aware of  
4 Kimberly Kendall having with Larry Braxton?

5 A Not to my knowledge.

6 Q Any other attorneys you know of that spoke with  
7 Larry Braxton?

8 A Not to my knowledge.

9 Q You said an investigator spoke with Larry  
10 Braxton. Who was that investigator?

11 A Tom Pavlish.

12 Q And how is it that you know that Tom Pavlish  
13 spoke to Larry Braxton?

14 A Because I had a conversation with Tom about who  
15 Larry was and what he told me. So we sent Tom  
16 to get the affidavit with Kim.

17 Q Other than the visit with Kim, do you know if  
18 Tom ever spoke to Larry Braxton separate from  
19 that?

20 MS. GELSOMINO: Objection.

21 A I actually don't remember if they did.

22 Q Am I correct in assuming the substance of the  
23 communication with Tom and Braxton is the same  
24 substance you just described for me a moment ago  
25 when Kim went to meet with Braxton?

**Video Deposition**

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1 A He kept asking him his events from the night of  
2 the crime.

3 Q And, of course, anything you know about that  
4 visit with Kim and Tom is something you learned  
5 from Kim or Tom?

6 A Correct.

7 Q You weren't there and you don't know firsthand  
8 what was said?

9 A Right.

10 Q I've seen a lot of different articles that have  
11 been written about Ru-El and his case by  
12 different reporters. Do you know any of the  
13 reporters that either spoke to Ru-El or reported  
14 on his case?

15 MS. GELSOMINO: Objection.

16 A Well, the first reporter I think was Kyle  
17 Swenson.

18 Q And he was a reporter with Cleveland Scene  
19 Magazine?

20 A Yes.

21 Q Other than Kyle Swenson, any other reporters?

22 A Ed Gallek.

23 Q And who is he a reporter for?

24 A I think it was Channel 5 maybe or I don't know,  
25 a news station in Cleveland.

**Video Deposition**

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1 Q Any other reporters?

2 A I don't know. I don't -- I don't remember.

3 Q Were you present or involved in any of the  
4 communications Ru-El had with Ed Gallek?

5 MS. GELSOMINO: Objection.

6 A Yes, uh-huh.

7 Q And just describe for me what the circumstances  
8 of those communications. For example, were they  
9 telephone calls, were they in-person meetings or  
10 maybe both?

11 MS. GELSOMINO: Objection.

12 A Telephone calls.

13 Q Telephone calls. Were they telephone calls  
14 while Ru-El was incarcerated?

15 A Yes.

16 Q Do you know if Ed Gallek has had any  
17 communications with Ru-El since he's been  
18 released from prison?

19 MS. GELSOMINO: Objection.

20 A Yes.

21 Q And those communications since Ru-El was  
22 released, were they communications over the  
23 telephone or in-person?

24 MS. GELSOMINO: Objection.

25 A I -- I think that they spoke on the phone and



**Video Deposition**

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1 saw each other in-person after El came home.

2 Q Since Ru-El got released to the best of your  
3 knowledge, what's your best estimate on how many  
4 times Ed Gallek and Ru-El Sailor have spoken?

5 MS. GELSOMINO: Objection.

6 A Maybe a couple times after he came home.

7 Q And of those times, approximately how many times  
8 were in-person meetings?

9 MS. GELSOMINO: Objection.

10 A Maybe twice.

11 Q Were you present at those in-person meetings?

12 A I think I was.

13 Q Where did the meetings take place?

14 A I think one was a sit-down interview at El's  
15 mom's house and then one was an interview that  
16 we did at like an anti-crime walk.

17 Q The telephone calls that Ed Gallek has had with  
18 Ru-El since Ru-El has been released, did you  
19 participate in those calls?

20 A No.

21 MS. GELSOMINO: Objection.

22 Q The telephone calls Ed Gallek had with Ru-El in  
23 prison though, you did participate in?

24 MS. GELSOMINO: Objection.

25 A Some, uh-huh.

**Video Deposition**

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1 Q They were three-way calls?

2 A Yeah, uh-huh.

3 MS. GELSOMINO: Objection.

4 Q Oh, the other reporter was Kyle Swenson?

5 A Right.

6 Q There were telephone conversation -- well,  
7 strike that. There were three-way telephone  
8 conversations between you, Ru-El, and Kyle  
9 Swenson while he was in prison; correct?

10 A Some.

11 Q Since Ru-El got released from prison, to your  
12 knowledge, has he had additional telephone  
13 conversations with Kyle Swenson?

14 MS. GELSOMINO: Objection.

15 A A few times after he came home, uh-huh.

16 Q Did you participate in those telephone  
17 conversations?

18 A No.

19 Q Since Ru-El has been released from prison, to  
20 your knowledge, has Kyle Swenson had any  
21 in-person meetings with Ru-El?

22 A We -- we met him once for dinner and I think we  
23 maybe saw him out and about once or twice at a  
24 couple events or not very often.

25 Q Did Kyle interview Ru-El after he got -- strike

**Video Deposition**

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1           that. Did Kyle interview Ru-El in-person since  
2           Ru-El got released from prison?

3                       MS. GELSOMINO:           Objection.

4   A       I don't think so. I don't think it was an  
5           interview.

6   Q       The dinner that Kyle Swenson had with Ru-El,  
7           where was that at?

8   A       Oh, man.

9                       MS. GELSOMINO:           Objection.

10   A       I think we were in D.C.

11   Q       And you participated in that dinner?

12   A       Yes.

13   Q       So you and Ru-El traveled to D.C. for the  
14           dinner?

15                       MS. GELSOMINO:           Objection.

16   A       Well, we were already in D.C.

17   Q       Oh.

18   A       And then because we were going there, we met up  
19           with him, let him know that we were -- we were  
20           coming and scheduled a dinner together.

21   Q       Yeah, I'm aware he got a job with some newspaper  
22           in D.C. Was he working there at the time?

23   A       Yeah, uh-huh.

24   Q       Do you recall the discussions you had with Kyle  
25           when you were at dinner with him?

**Video Deposition**

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1 MS. GELSOMINO: Objection.

2 A Just about how things were going and, you know,  
3 what life is like now that he's home, very  
4 informal. He introduced us to his wife. That's  
5 it.

6 Q I know from other work I've done, that Kyle  
7 Swenson has written, at least, one book. To  
8 your knowledge, did Kyle ever speak to Ru-El  
9 about writing a book about Ru-El's story?

10 A No.

11 MS. GELSOMINO: Objection.

12 Q No, you don't know?

13 A No, I don't know.

14 Q You said the other -- you said Kyle may have  
15 seen Ru-El at other events?

16 A Yeah.

17 MS. GELSOMINO: Objection.

18 A Well, we've been involved in like other protests  
19 and like Wrongful Conviction Day and things like  
20 that. Community events that Kyle may have been  
21 writing articles about, we've seen him at events  
22 like that.

23 Q Can you identify those events for me? For  
24 example, you -- you said one of them was a  
25 Wrongful Conviction Day?

**Video Deposition**

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1 MS. GELSOMINO: Objection.

2 A Well, those are some of the events that we do.  
3 So I don't know if that was where they saw each  
4 other at, but I -- I just remember it being some  
5 sort of event or rally.

6 Q You made a comment, those are some of the events  
7 that you do. What do you mean by that?

8 A Well --

9 MS. GELSOMINO: Objection.

10 A -- some of the events that -- that we go or that  
11 we're involved with.

12 Q Other than the wrongful conviction events, what  
13 other events or rallies do you recall attending  
14 where Kyle was present?

15 MS. GELSOMINO: Objection.

16 A I don't remember.

17 Q Putting aside Kyle, what type of rallies or  
18 events, social events like a rally have you and  
19 Ru-El attended since he's been out of prison?

20 MS. GELSOMINO: Objection.

21 A I don't know how many, maybe two or three a  
22 year.

23 Q But what was the cause or the purpose of the  
24 rallies?

25 A Oh.

**Video Deposition**

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1 MS. GELSOMINO: Objection.

2 A Usually like social injustice, wrongful  
3 conviction, things like that.

4 MR. CALDERONE: We've been going  
5 for an hour and a half. You want to take a  
6 quick break?

7 THE WITNESS: Yeah, it's a  
8 little chilly in here.

9 MS. GELSOMINO: Sure.

10 THE WITNESS: I want to go warm  
11 up a little bit.

12 MR. CALDERONE: Let's go off the  
13 record.

14 MS. GELSOMINO: Yeah, we can do  
15 that.

16 THE WITNESS: Okay.

17 THE VIDEOGRAPHER: We're off the  
18 record at 11:32.

19 (Short break taken.)

20 THE VIDEOGRAPHER: We're back on the  
21 record at 11:43.

22 By Mr. Calderone:

23 Q Amy, earlier you told me there was a -- a first  
24 conversation that you had with Ru-El. I think  
25 you said it was around 2013?

**Video Deposition**

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1 A Yes.

2 Q Where you and he started to reconnect and fair  
3 for me to say then developed or eventually  
4 entered into a relationship?

5 A Correct.

6 Q Fair for me to assume that you and Ru-El  
7 developed that relationship while he was in  
8 prison?

9 A Right.

10 Q Tell me about that call in 2013 and how it came  
11 to be.

12 A He had a conversation with my friend at the  
13 time. She told me that she spoke to him and he  
14 asked about me. Oh, man, I -- I think she gave  
15 him my number. Maybe she gave me his, I don't  
16 remember, but somehow we ended up texting or --  
17 or talking. And then later on that evening, we  
18 spent hours on the phone.

19 Q And that was the -- the beginning of the current  
20 relationship and marriage you have?

21 A Yep.

22 Q Since that call in 2013, fair for me to assume  
23 that you and Ru-El have continually been  
24 involved in a relationship?

25 A Yes.

**Video Deposition**

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1 Q The friend again, what was her name?

2 A Portia Goodgame.

3 Q Do you have Portia's contact information?

4 A I don't have it. I don't know it off the top of  
5 my head.

6 Q Do you still stay in contact with Portia?

7 A From time to time.

8 Q Will you please find Portia's contact  
9 information and either send it to me directly or  
10 give it to Sarah here and she'll get it to me;  
11 okay?

12 A Okay.

13 MS. GELSOMINO: What was her last  
14 name?

15 THE WITNESS: Goodgame.

16 MS. GELSOMINO: Thank you.

17 Q So explain to me then how the relationship with  
18 Ru-El developed from the point of that first  
19 call up to where you are now?

20 A Well, when we first spoke, it was just catching  
21 up, telling him about my life over the past nine  
22 or ten years since he had been in prison and him  
23 explaining the case to me and what prison life  
24 had been for him.

25 It was just friendly at first. We had



**Video Deposition**

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1           good conversation. We spoke every day and each  
2           day it developed more and more into a  
3           relationship.

4    Q       You indicated that most of these communications  
5           occurred on the cell phone?

6    A       Yes.

7    Q       And I take that to mean either speaking  
8           in-person or by text?

9    A       Yes.

10   Q       The cell phone that you used at that time was  
11           the number you gave me earlier today. What is  
12           it again?

13   A       My cell phone number?

14   Q       Yeah, 216?

15   A       No, I don't remember the number.

16   Q       Okay.

17   A       I've had my number changed I think since El's  
18           been home maybe. I don't know. I don't  
19           remember when I got it changed.

20   Q       But back in 2013 when the relationship started,  
21           it was the 216-702-3313 number?

22   A       No.

23   Q       At some time between 2013, though, and today,  
24           you were using that number; correct?

25   A       I was using the 702, uh-huh.

**Video Deposition**

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1 Q What number was Ru-El Sailor using if you  
2 recall?

3 A I don't remember.

4 Q Do you recall whose phone he was using for those  
5 communications?

6 A I -- no, I don't remember.

7 Q Do you know how he got the call or how he got  
8 the phone?

9 A I don't know how he got it.

10 Q But would he call you late at night when he was  
11 in his cell?

12 A Yes, yes.

13 Q And then a lot of calls would be late at night?

14 MS. GELSOMINO: Objection.

15 A We would talk throughout the day late at night.

16 Q Did Ru-El always call you or did you call him or  
17 both?

18 A Both.

19 Q At any time while Ru-El was incarcerated, did  
20 you take him a cell phone to use while he was in  
21 -- in jail?

22 A No.

23 MS. GELSOMINO: Objection.

24 Q At any time while Ru-El was incarcerated, do you  
25 know anybody else that took him a cell phone to

**Video Deposition**

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1 use while he was in jail?

2 A No.

3 Q You told me that during that initial call, Ru-El  
4 told you about his case and how he came to be in  
5 prison. What did he tell you at that time?

6 A Oh, well, he told me that him and Cordell had  
7 been out together throughout the day that night,  
8 different bars, clubs.

9 And then he told me how Cordell ended up  
10 on Englewood and having an altercation with Omar  
11 Clark and what happened that night. And then  
12 how El ended up getting brought into the case.

13 Q What did he tell you about the altercation  
14 Cordell was involved in?

15 MS. GELSOMINO: Objection.

16 A Nichole Hubbard was out with Dude and Omar  
17 Clark. They were smoking -- they were doing  
18 drugs, like smoking wet like PCP cigarettes or  
19 something.

20 And they wanted to get more but none of  
21 them -- the guys didn't have money, so Nichole  
22 said she would pay for it, but one of them had  
23 to give her half on it, but the money was back  
24 on Englewood.

25 So she drove them to get the money and

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1           instead of giving them -- giving her the money,  
2           one of them pulled a gun out on her and she  
3           ended up calling Cordell and telling him what  
4           happened.

5                     And -- and then Cordell and Will left the  
6           bar that they were at together, went on  
7           Englewood, and had an altercation where the  
8           crime occurred.

9    Q       You were not in a relationship with Ru-El Sailor  
10           the night of Omar Clark's murder; correct?

11   A       Correct.

12   Q       And fair for me to say your relationship with  
13           Omar -- I'm sorry, with Ru-El did not start  
14           until what, almost ten years after the murder?

15   A       Right.

16   Q       So you don't have any personal knowledge about  
17           what happened that night?

18   A       No.

19   Q       And prior to that 2013 call with Ru-El Sailor,  
20           you had never spoken to Ru-El about what  
21           happened the night of the murder?

22   A       Right.

23   Q       Prior to your call with Ru-El in 2013, you had  
24           never spoken to Cordell Hubbard about --

25   A       Right.

**Video Deposition**

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1 Q -- what happened that night?

2 A Right.

3 Q You did not attend Ru-El Sailor's trial?

4 A No.

5 Q Since that 2013 call when you spoke to Ru-El,  
6 have you ever been present or involved in a  
7 three-way call when Ru-El was talking to his  
8 attorneys?

9 MS. GELSOMINO: Objection.

10 A You said before --

11 Q No.

12 A -- or since 2013?

13 Q Since the 2013 call you had with Ru-El, have you  
14 ever been involved in meetings or conferences  
15 with Ru-El and any of his attorneys?

16 A Yes.

17 MS. GELSOMINO: Objection.

18 Q What attorneys have you been involved in  
19 meetings with?

20 MS. GELSOMINO: Objection.

21 A Kim --

22 Q Or strike that, let me re-ask --

23 A Okay.

24 Q -- that. What attorneys of Ru-El's have you  
25 been involved in meetings with?

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1 MS. GELSOMINO: Objection.

2 A Kim, Kimberly Kendall, and attorneys from the  
3 Ohio Innocence Project.

4 Q What other attorneys from the Ohio Innocence  
5 Project?

6 A Mark Godsey, Jennifer Bergeron, and there were  
7 two fellows. They weren't attorneys at the  
8 time.

9 Q But they were from the Ohio Innocence Project?

10 A Yes.

11 Q Now Attorney Kim Kendall has never represented  
12 you; correct?

13 A Correct.

14 Q And none of the attorneys from the Ohio  
15 Innocence Project have ever represented you;  
16 correct?

17 A Right.

18 Q What do you recall about the conversations that  
19 you heard when Ru-El was talking to Kim Kendall?

20 MS. GELSOMINO: Objection.

21 A Him explaining the case to her, him explaining  
22 his innocence. And then, you know, throughout  
23 her investigation of the case, they would talk  
24 about the -- the case and his claim of  
25 innocence.

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1 Q Can you tell me anything specific about the  
2 conversations Ru-El had with Kim about the case?

3 MS. GELSOMINO: Objection.

4 A Any specifics? I mean, it was always just about  
5 the case in general and, you know, him not being  
6 involved, and, you know, finding leads, you  
7 know, to help his claim of innocence, things  
8 like that.

9 Q What do you recall about the conversations with  
10 the attorneys from the Ohio Innocence Project  
11 that you participated in --

12 MS. GELSOMINO: Objection.

13 Q -- with Ru-El?

14 MS. GELSOMINO: Objection.

15 A It would be along the same lines, his claim of  
16 innocence, and the things that they were working  
17 on at the time.

18 Q Do you remember anything specific that they were  
19 working on?

20 A I don't remember. I don't remember at the -- at  
21 the time.

22 Q Now in all fairness to you, the conversations  
23 that Ru-El would have had with Kim Kendall were  
24 how many years ago?

25 MS. GELSOMINO: Objection.

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1 A Well, we met -- well, I met Kim myself first.  
2 We had conversations with her over the phone and  
3 -- and with El in-person in maybe 2016. I don't  
4 remember when she came on as his attorney.

5 Q Well, let me ask you this: When was the last  
6 time you spoke to Kim Kendall?

7 A Today.

8 Q What did you speak to her about today?

9 A She told me she was in Mexico.

10 Q Why were you speaking with her today?

11 A Well, I invited her to my daughter's graduation  
12 party and she didn't make it, so we were just  
13 texting this morning, not talking, sorry,  
14 texting.

15 Q So the communication today was coincidental?

16 A Yeah, uh-huh.

17 Q Prior to the text today, when was the last time  
18 you spoke to her?

19 A Just one day last week.

20 Q Now you indicated you spoke to Kim yourself over  
21 the phone sometimes back in 2016. What were the  
22 substance of those conversations?

23 MS. GELSOMINO: Objection.

24 A Just about the case.

25 Q Do you recall anything specific about the



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1           conversations?

2                           MS. GELSOMINO:           Objection.

3    A       It was always about the case in general. In the  
4           beginning, it was explaining the case to her.  
5           And then I -- I met with her and explained the  
6           case and his claim of innocence.

7                   And then it would just be about the case  
8           in general once she started, you know, diving in  
9           and learning about it herself.

10   Q       When you say in general though, I don't  
11           understand what that means.

12   A       What happened that night. How El was, you know,  
13           brought into the case, what his position was on  
14           it, who different people were, you know, just  
15           talking about the case as a whole everything  
16           that happened that night.

17                   And what he's done since he's been in  
18           prison to, you know, help his -- his  
19           exoneration.

20   Q       And am I correct that when you first spoke to  
21           Kim on that call, the information that you were  
22           relaying to her was information that you had  
23           learned from Ru-El?

24   A       Right.

25   Q       Before speaking to Kim Kendall about the case,

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1           did you ever get information about the case from  
2           any other source other than Ru-El?

3     A       Just word around town about what happened and  
4           word around town that El wasn't involved, but  
5           nothing through the courts or anyone involved.

6     Q       After that first call in 2013 with Ru-El as the  
7           relationship between you and he grew, did you  
8           begin to visit Ru-El?

9     A       Yes.

10    Q       And how frequently did you visit Ru-El while he  
11           was incarcerated?

12    A       Every weekend.

13    Q       Now I don't know much about the visitation  
14           program in prison. So some of my questions may  
15           seem silly or ignorant to you, but it's really  
16           because I don't know.

17                   How does that work for prison visits? Do  
18           you have to schedule them ahead of time? Are  
19           you limited in how often you can visit?

20                   Would -- would you please explain to me  
21           what you recall about that visitation program.

22    A       Well, you have to fill -- fill out an  
23           application first and be approved to visit and  
24           then once you're approved, the inmate -- and it  
25           might be different for each prison, but the

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1 inmate is allowed four visits a month.

2 And you have to schedule -- I would have  
3 to schedule the visit and I would get to see him  
4 from like 8:00 a.m. to 3:00 p.m. usually like  
5 every Saturday.

6 Q And for those visits, were you allowed to take  
7 things to him while he was in prison?

8 A No.

9 Q When those visits occurred, where did they occur  
10 at?

11 A In a visiting room in the prison.

12 Q So there's a designated room where visitors can  
13 spend the day with the inmates?

14 A Yes.

15 Q Other than that visiting room or visiting area,  
16 are there other areas where visitors are allowed  
17 to go with the inmate?

18 A There are, but I was never involved in any of  
19 those visits.

20 Q During those visits when you're -- when you were  
21 with Ru-El, what type of facilities or equipment  
22 or items were available for you and Ru-El?

23 For example, do they have games that you  
24 can play or do they have computers or can you  
25 facetime people?

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1     A       No.  So they -- they had lots of games.  They  
2            had like a children's area with books and toys.  
3            They had vending machines for food and sometimes  
4            there would be events where we could prepay for  
5            cooked meals or fast-food brought in from the  
6            outside.

7                    We sat across from each other in between a  
8            small table.  Sometimes we were allowed to hold  
9            hands.  We were only allowed to like hug or kiss  
10          hello and goodbye, but we would get to take  
11          pictures together at -- at one point during the  
12          visit.

13     Q       The visits, are they -- are they monitored  
14            meaning are there people watching?

15     A       Uh-huh, yep.

16     Q       Yes?

17     A       Yeah, yeah.  So they have a CO at a desk and  
18            then they usually have one or two like in a  
19            corner of the visiting room.

20     Q       And then the -- the prison calls, can you  
21            explain to me the format of the prison calls?  
22            For example, are the calls recorded?  There are  
23            people that -- I shouldn't say people, but the  
24            calls are recorded?

25     A       Yes.

**Video Deposition**

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1 Q Now those calls are different than any call you  
2 may make directly to Ru-El's cell phone?

3 A Correct.

4 Q The calls that go through the prison system, are  
5 those calls where Ru-El has to initiate the call  
6 to you?

7 A Yes.

8 Q And for any three-way calls, did Ru-El have to  
9 initiate the call to you and then you connect  
10 somebody to the call?

11 A Right.

12 Q As far as the calls that went through the prison  
13 system, were they limited in duration or time?

14 A Fifteen (15) minutes.

15 Q And at the min -- at the end of those 15  
16 minutes, the call would get cut off?

17 A Well, you would have 60 seconds remaining, so  
18 you knew it was ending and then they would cut  
19 off.

20 Q After they cut off though, Ru-El could call you  
21 right back and reinitiate a new call?

22 A Yes.

23 Q Is there any cost or money that was involved in  
24 the calls, the prison calls?

25 A Yes.

## Video Deposition

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1 Q What was that?

2 A I can't remember how much they cost, but I could  
3 put money on an account where he could just call  
4 me alone or I could put money on his account so  
5 that he could call anyone. And anyone could put  
6 money on the account, but I don't remember how  
7 much they were, \$1.00, \$2.00, I don't remember.

8 Q You and Ru-El, did you have any telephone calls  
9 that went through the prison system where Ru-El  
10 was calling you through a different inmate's  
11 account or phone?

12 A Yeah, sometimes.

13 Q And how did that work to your knowledge?

14 A Like if -- if somebody was on the phone and it  
15 wasn't his turn, he would have the person that  
16 the inmate was speaking to call me on three-way  
17 or if he didn't have money on his account,  
18 someone else would have money, and, you know,  
19 they would let him use their phone account to  
20 call me.

21 Q So the other inmate would call you once you were  
22 on the phone and they would basically hand the  
23 phone to Ru-El?

24 A I -- maybe. I don't know if that's how it  
25 worked, probably, yeah, something like that.

**Video Deposition**

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1 Q Okay.

2 A I don't know if he could just pick up the phone  
3 and call from someone else's account. I don't  
4 know how that works.

5 Q All right. Now since Ru-El's release from  
6 prison, you and he have lived together?

7 A Yes.

8 Q Since Ru-El's release from prison, have you and  
9 he taken any trips or vacations?

10 A Yes.

11 MS. GELSOMINO: Objection.

12 Q Where have you went for vacation or trips?

13 A We've been to D.C., Chicago, Florida, Atlanta,  
14 Arizona, I don't know, Detroit.

15 Q Any other trips you can think of that you and  
16 Ru-El have taken together?

17 A Yeah, we go on trips all the time, but I don't  
18 know. I don't remember, you know, local  
19 overnight stays, Columbus.

20 Q Since Ru-El has been out of prison, has he had  
21 any particular interest or hobbies that he's  
22 engaged in?

23 MS. GELSOMINO: Objection.

24 Q Putting aside his business.

25 A We have Monday dinners with our family every

**Video Deposition**

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1 week. We look forward to that every week. He  
2 coaches Myel's soccer team. I don't know, he's  
3 just like involved -- he's really involved with  
4 Comma Club.

5 He spends most of his time there from open  
6 to close. And anything in between is just stuff  
7 with the family or us doing things as a couple.

8 Q So take me through Ru-El's typical daily routine  
9 right now.

10 MS. GELSOMINO: Objection.

11 A Well, he wakes up in the morning. He spends a  
12 couple hours in the bathroom, no, just kidding.  
13 No, he -- he gets up in the morning and, you  
14 know, does his thing around the house and then  
15 he, you know, gets to Comma Club at like 10:00,  
16 because we open at 11. And he's there until  
17 seven, eight or nine at night.

18 Usually he'll leave at closing time which  
19 is seven, he'll come home, eat dinner, hang out  
20 for a little while and then go back to Comma  
21 Club just to clean up, close up, catch a couple  
22 of sales, and then he'll either go out or come  
23 home.

24 Q To your knowledge, does Ru-El take any  
25 medication now?



**Video Deposition**

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1 A Yeah.

2 MS. GELSOMINO: Objection.

3 A He has high blood pressure, so he takes  
4 medication for that.

5 Q Any other medication other than the high blood  
6 pressure?

7 A No.

8 Q And since he's been out of prison, to your  
9 knowledge, has he ever taken any other  
10 medication, putting aside a cold or something  
11 where he got antibiotics?

12 A No.

13 MS. GELSOMINO: Objection.

14 Q Does Ru-El Sailor see any doctors on a regular  
15 -- regular schedule now?

16 A Uh-uh.

17 Q Does --

18 A No.

19 Q That's no?

20 A No.

21 Q So I'm presuming if he gets sick or something,  
22 he sees a doctor on an as-needed basis?

23 A Yes.

24 MS. GELSOMINO: Objection.

25 Q Since Ru-El's been out of prison, has he seen

**Video Deposition**

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1 any psychiatrist or psychologist on a regular  
2 basis?

3 MS. GELSOMINO: Objection.

4 A No.

5 MR. CALDERONE: Let's go off the  
6 record real quick.

7 THE VIDEOGRAPHER: We're off the  
8 record at 12:06.

9 (Discussion off the record.)

10 THE VIDEOGRAPHER: We're back on the  
11 record at 12:17.

12 By Mr. Calderone:

13 Q Ms. Sailor, is it your understanding that from  
14 the time that Ru-El was first arrested for the  
15 murder of Omar Clark until his release in 2018,  
16 that he was continuously incarcerated?

17 MS. GELSOMINO: I'm sorry, can  
18 you say that again? I missed the beginning part  
19 of that.

20 Q Yeah, I'm just asking is it your knowledge since  
21 he was first arrested for the murder of Omar  
22 Clark until his release from prison, is it your  
23 understanding he was continually incarcerated?

24 A Yeah, I think so. I think he was. I don't -- I  
25 don't think he was ever given a bond.

**Video Deposition**

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1 Q In 2013 when you began your relationship with  
2 Ru-El Sailor, where were you living at that  
3 time?

4 A I was living in Euclid.

5 Q And what address?

6 A 20831 Tracy Avenue, Euclid 44123.

7 Q And who else lived with you at that address?

8 A Paige, Mia, and Olivia.

9 Q So it was just you and your daughters?

10 A Yes.

11 Q When did you move from that address?

12 A My house caught on fire in 2015 and I moved back  
13 in with my mom.

14 Q And where does your -- or did your mom live at  
15 that time anyways?

16 A On East Park, 18313 East Park.

17 Q Where is East Park at?

18 A Cleveland, 44119.

19 Q When you moved back in with your mom, other than  
20 you and your daughters, was there anybody else  
21 living at the house at that time?

22 A My mom and my stepdad.

23 Q How long did you continue to live with your mom  
24 and your stepdad?

25 A Under a year.

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1 Q And where did you move when you left your mom  
2 and your stepdad's house?

3 A On East 258th, I don't -- I can't remember the  
4 address.

5 Q In the City of Cleveland?

6 A Euclid, sorry, Euclid 44 -- I know it was 44132,  
7 but I don't remember the address.

8 Q Was it a house or an apartment?

9 A House.

10 Q Did you rent the house?

11 A Yes.

12 Q Did anybody else live there with you in that  
13 house other than your daughters?

14 A No.

15 Q How long did you live on the East 258th Street  
16 residence?

17 A From like sometime 2016 to maybe 2019.

18 Q Were you still living on East 258th Street when  
19 Ru-El got out of prison?

20 A Yes.

21 Q And when he got out of prison, did the two of  
22 you end up living together?

23 A Yes.

24 Q Did he move in with you on the East 258th Street  
25 address?

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1 A Yes.

2 Q And then when you moved out of the 258th Street  
3 address, am I correct that he moved out with you  
4 and wherever you went, then you moved in  
5 together?

6 A Yes.

7 Q Where did you go after the East 258th Street  
8 residence?

9 A 55th Sunnycliff Drive, Euclid 44123.

10 Q Sunnycliff?

11 A Yes.

12 Q And I'm sorry, you said Euclid?

13 A Yep, 1 -- 44123.

14 Q Was that a house?

15 A Yes.

16 Q And were you and Ru-El or you and/or Ru-El  
17 renting the house or did you buy the house?

18 A We were renting.

19 Q And how long did you live there?

20 A Until 2020.

21 Q So you lived there for roughly a year?

22 A Yep.

23 Q And where did you move after Sunnycliff Drive?

24 A To 384 East 211th, Euclid 44123.

25 Q Was this an apartment or a house?

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1 A House.

2 Q Renting?

3 A Yes.

4 Q How long did -- and Ru-El lived there with you,  
5 of course; right?

6 A Right.

7 Q How long did you and Ru-El live on 384 East  
8 211th Street?

9 A We still live there since 2020.

10 Q Do you and Ru-El have any plans to buy a house  
11 or live in any particular area?

12 A Yeah, we've been looking for a few years. At  
13 first we were looking in Euclid and then once we  
14 really couldn't find anything to our liking, we  
15 started to look in other cities, sometimes other  
16 states.

17 Q When did you and Ru-El get married?

18 A 2019.

19 Q Right after he got out of prison?

20 A A year after he got out of prison.

21 Q And I'm sure you and he have talked about the  
22 future. What -- what's your plans -- when I say  
23 your plans, I mean, you and Ru-El, what's your  
24 plans for the future?

25 MS. GELSOMINO: Objection.

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1 A Well, we hope to expand Comma Club, do more with  
2 our nonprofit, buy a house, travel.

3 Q Anything else you've talked about for the future  
4 with Ru-El?

5 A Just living day-to-day.

6 Q I may have asked you before, if I have, forgive  
7 me. When Ru-El was in prison, you told me about  
8 visiting him once a week and talking to him on  
9 the phone.

10 Did you ever send him mail while he was in  
11 prison?

12 A Uh-huh, yes.

13 Q By U.S. mail?

14 A Yes.

15 Q How about e-mails?

16 A JPay e-mails.

17 Q What is JPay?

18 A It's the app outside friends and families use to  
19 communicate with inmates.

20 Q If you would, please explain to me how that  
21 worked.

22 A I created an -- an account and added him through  
23 his inmate number and I would have to put money  
24 on my account to buy stamps to send him e-mails  
25 or money on the account, so that he could

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1           respond or send the e-mails to other people.

2       Q       Those e-mail communications, do you know if they  
3           were monitored by others?

4       A       They are.

5       Q       When you would send him an e-mail as long as  
6           there was money in the JPay account, could he  
7           respond by e-mail?

8       A       Yes.

9       Q       We've talked about the fact that you had calls  
10          with Ru-El and I think you said that you guys  
11          spoke almost -- if not, every day?

12      A       Uh-huh. Yeah, we did.

13      Q       Fair for me to assume that you cannot recall  
14          today all the substance or the details of all  
15          the calls that you had during the how many  
16          years, 15 plus years he was in prison?

17      A       Well, it was only for the last five that we  
18          communicated, but I don't know.

19      Q       True. Do any particular conversations with  
20          Ru-El during those last five years stand out in  
21          your mind as we sit here right now.

22                      MS. GELSOMINO:           Objection.

23      A       I don't know. There were so many. We talked  
24          about what life would be like once he came home.  
25          He was always confident that he was coming home.



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1 I never doubted him. I always felt like he was  
2 going to come home. So we talked about the  
3 future and all the things that he wanted to do,  
4 all the things that he missed out on, you know,  
5 how his life was going to be with the kids, us  
6 getting married, us starting a family, things  
7 like that.

8 Q Now after reconnecting in 2013 and -- and  
9 starting a new relationship with Ru-El from that  
10 2013 date up through the time until Ru-El got  
11 released, you and Ru-El worked very hard to get  
12 him released; correct?

13 A Right.

14 MS. GELSOMINO: Objection.

15 Q Take me through the things you did toward  
16 getting Ru-El released.

17 MS. GELSOMINO: Objection.

18 A Well, I created an e-mail and I would just copy  
19 and paste it, send it to any and everyone I can  
20 think of, news reporters, celebrities. I would  
21 message people on social media platforms  
22 explaining his case.

23 At one point I created a packet with paper  
24 details about his case and I would take it to  
25 news stations and radio stations, anyone with

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1           like any sort of like political ties. I would  
2           go to political meetings and any sort of  
3           community meetings with community  
4           representatives and -- and things like that.

5                     I had a rally twice at the Justice Center,  
6           yeah.

7    Q       The packet of information that you -- you took  
8           to news stations and gave to reporters, what was  
9           in that packet?

10   A       In the beginning it was just like a -- a written  
11           description of the case and his claim of  
12           innocence. I think I had a picture of him,  
13           maybe a picture of him with his kids.

14                     And then once -- once Kimberly Kendall  
15           wrote the application of innocence for the  
16           Conviction Integrity Unit, I printed that  
17           document and would hand that to people.

18   Q       Do you still have that application today?

19   A       Somewhere in an e-mail.

20   Q       I was going to say, do you have it  
21           electronically or do you have a hard copy or  
22           both?

23   A       I'd have to look. I'm not sure. I don't think  
24           I have a -- a paper copy anymore.

25   Q       How about the packet of information that you

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1           gave to the news reporters, do you still have  
2           that information?

3     A       No.

4     Q       Did you keep that information electronically or  
5           hard copy or both?

6     A       I don't know if I typed it up and just printed  
7           it out and made copies. I -- I would -- I don't  
8           know. I would have to go back and look.

9     Q       You told me about the application to the CIU  
10           that you gave out and the photo and a  
11           description of the case.

12               What other information that was in the  
13           packet that you gave out to the media or news  
14           reporters about the case?

15    A       It was just a -- a description of the case  
16           itself and his claim of innocence. I don't  
17           really remember exactly what was in it.

18    Q       Did you at any point acquire a copy of the trial  
19           transcript or any of the documents, I'll say  
20           exhibits, from his case?

21    A       I don't know if anyone had ever given them to me  
22           or if I've just seen them, but I -- because I  
23           have seen them. I don't -- I don't remember how  
24           I got them, though.

25    Q       Did you provide copies of any transcripts from

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1 the trial to anyone else to make an effort to  
2 get Ru-El released from prison?

3 A I don't -- I think Kim might have been the only  
4 person I ever had a conversation with about the  
5 transcripts, maybe the OIP. I don't -- I don't  
6 think I ever gave any transcripts to anyone.

7 Q What else did you do to work towards Ru-El  
8 getting released from prison?

9 A I just kept in contact with his attorneys. I  
10 would reach out to, like I said, any like  
11 political parties or community leaders, church  
12 members, and -- and things like that.

13 Q Were these contacts with the political parties  
14 or church people written contact or in-person  
15 contact or perhaps both?

16 A I think it was mostly in-person. I don't know  
17 if I ever actually wrote anything to any  
18 political parties. I think it was mostly in  
19 person.

20 Q Is there anything else you did to work on Ru-El  
21 getting released from prison?

22 A I had close communication with Russel Tye in the  
23 Conviction Integrity Unit. When Michael  
24 O'Malley was running for mayor, I would pretty  
25 much follow him wherever he was going just so

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1           that I could get up and speak about Ru-El's  
2           case.

3                   But I remember one -- one event, he was  
4           like, "You know, if I take office, you know, his  
5           case is going to be the first thing I look at.  
6           You know, we're going to do whatever we can to  
7           help him out."

8                   I remember the first conversation I had  
9           with Russell Tye after he had looked into the  
10          case. He told me personally that he believed El  
11          was innocent.

12   Q          When the Conviction Integrity Unit investigated  
13               this file, did they ever communicate with you  
14               about their investigation?

15   A          Yes.

16   Q          And who, to your knowledge, are the people that  
17               worked on reviewing Ru-El Sailor's file from the  
18               Conviction Integrity Unit other than Russell  
19               Tye?

20   A          I can't remember the man's name who was running  
21               the office before O'Malley took office. He was  
22               under like McGinty, but I can't remember his  
23               name, but I -- I had communicated with him.

24                   Another man that works in the office named  
25           Michael O'Malley, but not the Michael O'Malley.

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1           did I say mayor earlier? Did I? I meant  
2           prosecutor.

3       Q       Did you ever supply additional information to  
4           the Conviction Integrity Unit to consider in  
5           getting Ru-El out of jail?

6                       MS. GELSOMINO:           Objection.

7       A       I don't know if I ever really provided anything  
8           to them that they didn't access themselves or  
9           had access to themselves. I -- I don't know. I  
10          don't remember.

11      Q       Now at some point the Ohio Innocence Project got  
12          involved in Ru-El Sailor's case; correct?

13      A       Uh-huh, yeah.

14      Q       Yes?

15      A       Right.

16      Q       Do you know how that came to be?

17      A       So I know that El had filed an application with  
18          them over the years, but they had turned it  
19          down. And once Kyle Swenson wrote the article  
20          in the Scene Magazine, he mentioned the case to  
21          Brian Howell who worked for the Innocence  
22          Project.

23                       And I don't know what happened behind the  
24          scenes from there, but we were told that he had  
25          to fill out another application. And to speed

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1           that along, I filled it out and signed his name  
2           and mailed it in and they accepted it.

3     Q       So this was an application to the Ohio Innocence  
4           Project?

5     A       Right.

6     Q       That application, can you tell me what it  
7           consisted of; was it just a matter of answering  
8           questions?

9     A       It's really, really basic. Well, it was at the  
10          time, just his name and his basic information,  
11          and then they -- I think maybe a short  
12          description of his claim of innocence. I don't  
13          remember exactly.

14    Q       Did the application require that you also  
15          provide any other information or evidence to the  
16          Ohio Innocence Project?

17    A       I don't think it did. No, I don't think so.

18    Q       Did Kim -- to your knowledge did Kim have  
19          communications with the Ohio Innocence Project?

20    A       I believe so.

21    Q       What is your understanding of her communications  
22          with the Ohio Innocence Project?

23                   MS. GELSOMINO:           Objection.

24    A       They worked together on El's case.

25    Q       To your knowledge did Kim provide documents,

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1 evidence, or information to the Ohio Innocence  
2 Project?

3 A I think so.

4 Q Did you ever receive copies of her  
5 communications to the Ohio Innocence Project?

6 A No, uh-uh. I don't think I did.

7 Q You mentioned Kyle Swenson talking to someone  
8 from the Ohio Innocence Project. Did Kyle tell  
9 you he contacted someone from the Ohio Innocence  
10 Project?

11 MS. GELSOMINO: Objection.

12 A I actually don't remember how their interaction  
13 came about. I'm not -- I'm not sure who  
14 contacted who and how it was mentioned.

15 Q I want to ask you a few questions about Kyle  
16 Swenson. Before Ru-El Sailor was released from  
17 prison, my understanding is that you had several  
18 different conversations with Kyle Swenson about  
19 Ru-El's case?

20 A Right.

21 Q Do you know if Kyle Swenson recorded any of  
22 those conversations?

23 A I don't remember if he did. I -- I think we  
24 only met one time in-person in a cafe and I  
25 don't remember where. I'm not sure if he



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1 recorded. I don't remember.

2 Q Now other than the in-person conversation, you  
3 had telephone conversations with Kyle about  
4 Ru-El's case?

5 A Right.

6 Q Do you know if any of those telephone  
7 conversations were recorded by Kyle?

8 A I don't know.

9 Q You told me that there were three-way  
10 conversations between you and Ru-El and Kyle  
11 while Ru-El was in prison; correct?

12 A Right.

13 Q Do you know if Kyle Swenson recorded any of  
14 those conversations?

15 A I don't know.

16 Q How did you first come -- you yourself first  
17 come to meet and speak to Kyle Swenson?

18 MS. GELSOMINO: Objection.

19 A El told me about a -- a guy who wrote a book. I  
20 think it was about Ricky Jackson, another  
21 exoneree from Ohio and he asked me if I would  
22 reach out to him and I did.

23 And then we -- you know, we had a  
24 conversation over the phone and then met up  
25 in-person.

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1 Q And you said you reached out to Kyle. How did  
2 you reach out to Kyle? Did you call him or send  
3 him a letter or an e-mail or what?

4 A Oh, man, I don't remember. Well, I think I had  
5 to track him down through the Scene. So I don't  
6 know if they transferred me to him or if they  
7 gave me his e-mail address. I don't remember.

8 Q In that first conversation you had with Kyle  
9 when he responded to you, tell me what you  
10 recall about that conversation.

11 MS. GELSOMINO: Objection.

12 A Just me explaining the case and El's claim of  
13 innocence.

14 Q At any time during that initial conversation  
15 with Kyle Swenson, did he tell you that he was  
16 interested in doing a story on Ru-El?

17 A I can't remember what he said, but I just  
18 remember feeling excited and optimistic. We  
19 thought that, you know, something good was going  
20 to come of it and he did end up writing the  
21 article so.

22 Q What is your best estimate of when you first  
23 spoke to Kyle Swenson?

24 A Oh, man, when was that? Maybe 2016 or 2017. I  
25 -- I don't remember.

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1 Q When was the last time you spoke to Kyle?

2 A Oh, man, years.

3 Q All right. Back when after you first initiated  
4 contact with Kyle, can you estimate for me  
5 approximately how many conversations you had  
6 with Kyle about Ru-El's case? Give me some  
7 idea.

8 MS. GELSOMINO: Objection.

9 A Maybe 20, I don't know.

10 Q Was Kyle -- in your opinion was Kyle an  
11 important person in getting Ru-El released from  
12 prison?

13 MS. GELSOMINO: Objection.

14 A Not getting released, but getting his story out  
15 there.

16 Q And I'm sure when you spoke with Kyle about  
17 Ru-El's case, you would keep Ru-El informed  
18 about the conversations and communications you  
19 were having about Kyle; correct?

20 A Right.

21 Q And am I correct that as you continued to do any  
22 of the things you did to try and get Ru-El  
23 released, you would keep him updated as to what  
24 you were doing, who you were talking to, or who  
25 you were giving information to?

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1 A Right.

2 Q Do you recall speaking to any of the witnesses  
3 from Ru-El's criminal case about trying -- about  
4 them recanting or changing their testimony?

5 MS. GELSOMINO: Objection.

6 A The only person that I ever spoke to about the  
7 case was Larry and it was never about him  
8 recanting. It was just him offering his  
9 apologies and offering to come forward and do  
10 the right thing in his words.

11 Same thing with Umar Clark. He -- it was  
12 the same, "I'm going to do whatever it takes.  
13 You know, I'm going to help. Just let me know.  
14 Tell me what you need to -- what you need me to  
15 do."

16 MR. CALDERONE: Let's take a  
17 quick break for a second.

18 THE VIDEOGRAPHER: We're off the  
19 record at 12:30 p.m.

20 (Lunch break taken.)

21 THE VIDEOGRAPHER: We're back on the  
22 record at 1:14.

23 By Mr. Calderone:

24 Q Ms. Sailor, I was asking you questions about  
25 your telephone conversations with Ru-El and with

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1 Kyle Swenson while Ru-El was in prison. I've  
2 got some documents I'm going to mark on the  
3 record here and I want to ask you questions  
4 about or actually, I have some disks.

5 MS. GELSOMINO: For me, thank  
6 you.

7 MR. CALDERONE: Yeah. For the  
8 record, I have one copy here that will go into  
9 evidence. I've got an exhibit marked as Exhibit  
10 A which was a subpoena issued to Global Tel  
11 Link, Corp. with the duces tecum to produce a  
12 number of calls that Ru-El Sailor was involved  
13 in. There's a duces tecum, Exhibit A, and with  
14 the subpoena is a verification or a  
15 certification from that company with calls that  
16 they produced.

17 And they produced I believe a total of  
18 eight CD disks. Those CD disks have been marked  
19 as Exhibits A1 through A8 and labeled as they  
20 were that I received them. These are disks that  
21 were already produced in the course of discovery  
22 to the City of Cleveland and Plaintiff's  
23 counsel.

24 I've mark as Exhibit B a subpoena that  
25 was sent to the same entity for more calls, but

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1 Exhibit B is a subpoena that had a duces tecum  
2 requesting recordings of any and all calls made  
3 to the phone number 216-702-3313 or any and all  
4 calls made to 216-273-3211 by any inmate.

5 With the subpoena, we got a production  
6 of multiple CD disks which I've marked Exhibits  
7 B1 through B8 and we got a verification signed  
8 by the entity, that Global Tel Link, that  
9 produced the CDs. So Exhibits A and B are  
10 exhibits to this deposition of all of those  
11 calls.

12 MS. GELSOMINO: Ken, just so that  
13 I make sure I have everything, on the -- so A is  
14 fine. That's the subpoena. A1 through A8 are  
15 disks of all calls received and then B1 through  
16 B8 are disks of all calls?

17 MR. CALDERONE: That's correct.

18 MS. GELSOMINO: Do I have -- I  
19 don't have those; do I? Are they --

20 MR. CALDERONE: Oh, yeah, you --

21 MS. GELSOMINO: -- in here  
22 somewhere?

23 MR. CALDERONE: -- you have them.  
24 We've produced them all.

25 MS. GELSOMINO: Oh, you mean

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1           they're previously produced?

2                   MR. CALDERONE:           Yes, these were  
3           produced long ago.

4                   MS. GELSOMINO:           Okay. I mean, I  
5           know that they were produced, but I don't have  
6           -- I'm not receiving them in this deposition,  
7           like I don't have A1 through A8 --

8                   MR. CALDERONE:           No, I --

9                   MS. GELSOMINO:           -- or B1 through  
10          B8.

11                  MR. CALDERONE:           I have a copy of  
12          the disks here. Since they've already been  
13          produced --

14                  MS. GELSOMINO:           Okay.

15                  MR. CALDERONE:           -- I'm going to  
16          put them with the transcript.

17                  MS. GELSOMINO:           That's fine.

18                  MR. CALDERONE:           And for the  
19          record, I have as Exhibit C -- do you that  
20          binder?

21                  MR. FORD:                Yeah.

22                  MS. GELSOMINO:           Exhibit C I have  
23          a thumb drive.

24                  MR. CALDERONE:           Yes. For the  
25          record, rather than combing through the disks of

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1 hundreds of phone calls, some of the calls I'm  
2 going to ask questions about, I have downloaded  
3 from the disks and separately marked them as  
4 select calls that I've marked as exhibit --

5 MR. FORD: You can have this  
6 one.

7 MR. CALDERONE: -- that I've  
8 marked as Exhibit C. Some of those calls I made  
9 transcripts of that were referred to today and  
10 those transcripts are marked Exhibit C1 through  
11 Exhibit C10. So I just want to be clear on the  
12 record what we're working from.

13 Q So to go on with my questioning here, Ms.  
14 Sailor, I want to draw your attention to --

15 MR. CALDERONE: I need a binder  
16 for her.

17 Q I want to draw your attention to a call that was  
18 produced on Exhibit C of the list of calls to  
19 your phone number. And the call I'm going to  
20 refer to is a call on May 3rd, 2016. The  
21 electronic file on the disk is disk number two,  
22 call number 617.

23 And for your convenience, I've had a  
24 transcript of this call made and I've marked it  
25 as Exhibit C1 that we have in front of you. If



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1           you would, just take a moment and look at the  
2           first couple two pages and see if the first  
3           couple pages refresh your memory at all about  
4           speaking with Ru-El Sailor that day.

5                     And then you tell me when you're ready for  
6           me to ask you a question.

7    A        Okay.

8    Q        Does that refresh your memory about speaking  
9           with Ru-El that day?

10   A        No.

11   Q        All right. I'm going to draw your attention to  
12           page four, line eight of the transcript. I'm  
13           going to ask you to read from page four, line  
14           eight of Exhibit C1 and read to page eight, line  
15           eight. If you would, please read those pages.

16   A        "Mr. Sailor, hello."

17   Q        You don't have to read it --

18   A        Oh.

19   Q        -- out loud.

20   A        Oh, I'm sorry. Okay.

21   Q        Does reading that transcript of what I am  
22           representing to you to be what is on the  
23           recording refresh your memory about a  
24           conversation you had that day with Mr. Sailor?

25   A        I don't remember this specific conversation.

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1 Q All right. Well, to further refresh your  
2 memory, I'm going to play this segment of the  
3 audio recording for you.

4 MR. CALDERONE: And for the  
5 record, we're going to -- we're going to go to  
6 Exhibit C, which is a May 3rd, 2016, phone call  
7 disk two, call number 617, and I'd like to play  
8 from time mark two minutes, 59 seconds to time  
9 mark seven minute, four seconds. Would you  
10 please play --

11 MR. GELSOMINO: Hold on, can you  
12 just tell me those time marks again?

13 MR. CALDERONE: Two minutes, 59  
14 seconds to seven minutes and four seconds.

15 MS. GELSOMINO: Thank you.

16 MR. CALDERONE: Would you please  
17 play that recording?

18 (Jail call played.)

19 MR. CALDERONE: Is that the  
20 recording.

21 Q Now I want to stop there. Hearing that  
22 conversation, you do recognize Ru-El's voice on  
23 the recording; don't you?

24 A Yes.

25 Q And you recognize Kyle Stewart's voice on the

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1 recording?

2 A Swenson.

3 Q I'm sorry.

4 A Uh-huh, yes.

5 Q Kyle Swenson. You were a part of this three-way  
6 conversation as well; correct?

7 A Right.

8 Q Does this help refresh your memory about that  
9 part of the conversation?

10 A I -- I don't remember how the conversation went.  
11 It -- it all sounds familiar.

12 Q Based upon what we've heard from that call so  
13 far, we know this was a three-way conversation  
14 that you, Ru-El, and Kyle Swenson were involved  
15 in; correct?

16 A Right.

17 Q We know that Kyle Swenson indicated that he was  
18 recording this conversation; correct?

19 A Right.

20 Q So the conversation was, so to speak, on the  
21 record?

22 A Right.

23 Q And we know during the conversation that was on  
24 the record Ru-El described for him that he  
25 didn't know Cordell Hubbard had left the bar

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1           that night of the murder; correct?

2     A       Right.

3     Q       And that Cordell -- I'm sorry, that Ru-El Sailor  
4           never learned about what had happened that night  
5           from Cordell until long after he had already  
6           been arrested and was in County?

7                       MS. GELSOMINO:           Objection.

8     A       Well, that's what he said.

9     Q       That's what he said in the recording. I will  
10           represent to you that this conversation went on  
11           for 15 minutes and as you described, was  
12           automatically cut off at that 15-minute mark?

13    A       Right.

14    Q       All right. I want to draw your attention to a  
15           different part of this same conversation on May  
16           3rd, 2016.

17                       MR. CALDERONE:           And for the  
18           record I'd like to turn to a call that's  
19           identified on May 3rd, 2016, disk number two,  
20           call number 618.

21    Q       And for your convenience, I have marked a  
22           transcript of that call as Exhibit C2. Would  
23           you please turn to Exhibit C2?

24    A       What page number?

25    Q       It's tabbed here --

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1 A Oh, C2.

2 Q -- as number two.

3 A Oh, okay. Uh-huh. Oh, okay.

4 Q And I'd like you to take a moment and read from

5 page two, line 15 to page four, line 23. And if

6 you want to mark those so you know where to

7 start and stop, feel free to do that.

8 A Line?

9 Q Page two, line 15.

10 A Okay.

11 Q To page four, line 23 of Exhibit C2.

12 A Okay.

13 Q Please take a minute and read that part of the

14 transcript.

15 A Oh, I read ahead.

16 Q All right.

17 A Sorry.

18 Q So did you --

19 A Okay. Go ahead.

20 Q Did you read that part? Does reading from page

21 two to page four refresh your memory of the

22 conversation you had that day with Ru-El Sailor?

23 A I just don't remember this day.

24 Q All right. To further refresh your memory, I'm

25 going to play that part of the actual audio

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1 recording.

2 MR. CALDERONE: So for the record  
3 we're playing a call dated May 3rd, 2016, disk  
4 two, call number 618. I'd ask that we play from  
5 the time mark of one minute to the time mark of  
6 two minutes and 44 seconds. Please play that  
7 recording.

8 (Jail call played.)

9 By Mr. Calderone:

10 Q All right. We stopped there. This is a  
11 continuation of the call we listened to a moment  
12 ago. You still recognize your voice on the  
13 recording; correct?

14 A Right.

15 Q You still recognize Ru-El's voice on that  
16 recording; correct?

17 A Yes.

18 Q And when the first call cut off, you and Ru-El  
19 had a discussion that day between the two of you  
20 before you got Kyle Swenson back on the phone;  
21 correct?

22 A Right.

23 Q And in that conversation, you told Cordell --  
24 I'm sorry, you told Ru-El that he had to be  
25 honest with Kyle Stewart; correct?

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1 A Swenson.

2 MS. GELSOMINO: Swenson.

3 Q I'm sorry, Kyle Swenson; correct?

4 A Right.

5 Q You told him that he should speak to Kyle  
6 Swenson off the record and tell him what he knew  
7 about in advance?

8 A Right.

9 MS. GELSOMINO: Objection. That  
10 is not --

11 Q Correct?

12 MS. GELSOMINO: The -- the  
13 records will speak for themselves.

14 MR. CALDERONE: I'm paraphrasing.

15 Q Right, is that --

16 MS. GELSOMINO: Objection.

17 Q Is that the gist of what you told him?

18 MS. GELSOMINO: Objection.

19 A I -- I mean, I don't remember the -- the  
20 conversation. I don't remember what I was  
21 telling him to be honest about it unless I keep  
22 reading or keep listening.

23 Q All right. But at least at this beginning part  
24 of the conversation, you had told Ru-El Sailor  
25 that he needed to be honest with Kyle Swenson

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1           and tell him off the record what Ru-El knew in  
2           advance?

3                       MS. GELSOMINO:           Objection.

4    A       Say that again.

5    Q       I'll tell you what, let's just play the rest of  
6           the recording --

7    A       Well --

8    Q       -- and maybe that'll help refresh your memory.

9    A       I do not like listening to him.

10   Q       You don't like listening to who?

11   A       It's hard to like relive and listen to that.

12   Q       Okay. Well, instead of asking you a question --

13                   MR. CALDERONE:           If you would  
14           continue to play the audio. We're going to  
15           continue to play and I'd ask you to continue to  
16           play up to the time mark of five minutes and 40  
17           seconds.

18                   (Jail call played.)

19   Q       Okay. I want to stop there. Does that audio  
20           recording of the conversation that day refresh  
21           your memory about the three-way conversation  
22           you, Ru-El, and Kyle Swenson had on May 3rd of  
23           2016?

24   A       I just don't remember the exact -- I mean, there  
25           was so many phone calls. I just don't remember



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1 the exact conversation.

2 Q Well, this is the exact conversation; isn't it?

3 A I recognize everything that's being said. I  
4 just -- just don't remember it at the time.

5 Q Well, listening to it now, does it refresh your  
6 memory that when Ru-El Sailor spoke to Kyle  
7 Swenson off the record, he shared with Kyle that  
8 Cordell Hubbard called him the night of the  
9 murder and asked Ru-El to pick him up? You  
10 heard that; didn't you?

11 A I did hear that.

12 MS. GELSOMINO: Objection.

13 Q Ru-El Sailor told you and Kyle Swenson that on  
14 the night of the murder, Cordell Hubbard was  
15 distraught and upset when Ru-El picked him up?  
16 And you heard that; didn't you?

17 A I did just hear that.

18 Q You heard Ru-El Sailor tell you and Kyle Swenson  
19 that on the night of the murder, Cordell Hubbard  
20 confessed to Ru-El that Cordell had shot a man  
21 in self-defense?

22 MS. GELSOMINO: Objection.

23 Q You heard that; didn't you?

24 A I did just hear that.

25 Q You heard Ru-El tell you and Kyle Swenson that

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1           on the night of the murder, Cordell Hubbard  
2           confessed to him that Will Sizemore was with  
3           Cordell at the time of the shooting?

4                       MS. GELSOMINO:           Objection.

5    Q       You heard that; didn't you?

6                       MS. GELSOMINO:           Sizemore's --

7    A       Oh, well --

8                       MS. GELSOMINO:           -- name is not --

9    A       -- I think I heard him --

10                      MS. GELSOMINO:           -- in the  
11           transcript.

12   A       -- just say Will.

13   Q       Will?

14   A       And I did just hear that.

15   Q       You heard on the tape that Ru-El Sailor told you  
16           and Kyle Swenson that on the night of the  
17           murder, Cordell Hubbard confessed to Ru-El that  
18           Will knew the guy that was shot?

19                      MS. GELSOMINO:           Objection.

20   A       He did just say those things to Kyle. I don't  
21           know if I was on the phone at the moment or if I  
22           sat it down. I don't remember.

23   Q       Well, you're the one that patched Kyle Swenson  
24           onto that call?

25   A       Correct.

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1 Q And before you patched Kyle onto the call, you  
2 told Ru-El Sailor he needed to be honest with  
3 Kyle and tell Kyle about what Ru-El knew in  
4 advance; correct?

5 MS. GELSOMINO: Objection.

6 A I just don't remember what I was telling him to  
7 be honest about.

8 Q Isn't it true before Ru-El informed Kyle during  
9 this phone call about what Cordell Hubbard had  
10 -- had confessed the night of the murder that  
11 Ru-El had already told you the truth about what  
12 happened the night of the murder?

13 MS. GELSOMINO: Objection.

14 A I honestly don't remember.

15 Q So Ru-El might have told you or he might not  
16 have; you just don't remember?

17 MS. GELSOMINO: Objection.

18 A I don't remember.

19 MR. CALDERONE: Let's continue to  
20 play the recording and if you would, continue to  
21 play up to the time mark of six minutes and 59  
22 seconds.

23 (Jail call played.)

24 Q Now after hearing that recording and the one  
25 before that, during the phone call, isn't it

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1 true that Ru-El Sailor on May 3rd of 2016,  
2 informed Kyle Swenson that one of the reasons  
3 Ru-El did not come forward with the truth about  
4 what he knew the night of the murder was because  
5 he didn't want to tell on his best friend,  
6 Cordell Hubbard or incriminate Cordell Hubbard?

7 MS. GELSOMINO: Objection.

8 A That's what the recording said.

9 Q Isn't it true that during these couple  
10 recordings we just heard here that Ru-El Sailor  
11 also indicated on May 3rd of 2016, to Kyle  
12 Stewart -- Kyle Swenson that another reason he  
13 didn't want to come forward with the truth is  
14 because Ru-El didn't want to lose the support of  
15 Mike Clark?

16 MS. GELSOMINO: Objection.

17 Q You can answer.

18 A I don't know who Mike Clark is.

19 Q How about Umar Clark?

20 A Okay. What was --

21 MS. GELSOMINO: Objection.

22 A -- the question? What was the question?

23 Q The question is: Isn't it true on these  
24 recordings that we listened to that Ru-El told  
25 Kyle Swenson that night one of the reasons he

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1           didn't come forward with the truth about what he  
2           knew the night of the murder was because Ru-El  
3           Sailor did not want to lose the support of Umar  
4           Clark?

5                           MS. GELSOMINO:           Objection.

6   A       That's what the recording said.

7   Q       And isn't it true that Ru-El Sailor on May 3rd  
8           of 2016, told Kyle Swenson that he thought he  
9           was innocent and he would win the case and after  
10          they got into trial, they were too far down the  
11          road for Ru-El Sailor to come out with the truth  
12          about what he knew the night of the murder?

13                       MS. GELSOMINO:           Objection. The  
14          record speaks for itself.

15   A       Yeah, that's what the recording says.

16   Q       Now again, you're not denying that that was  
17          Ru-El Sailor talking to Kyle Swenson; correct?

18   A       Right.

19   Q       You're not denying that you're the one that  
20          patched Kyle Swenson into that call; correct?

21   A       Right.

22   Q       And you're not denying that anything in these  
23          conversations we just heard so far is anything  
24          but the truth?

25                       MS. GELSOMINO:           Objection.

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1 A I don't know if it's the truth. I might not  
2 have been on that phone call. I just don't  
3 remember.

4 Q Well, Ru-El being in -- in prison for several  
5 years wrongfully convicted was a big deal;  
6 right?

7 A Uh-huh.

8 MS. GELSOMINO: Objection.

9 Q Yes?

10 A Yes.

11 Q And isn't knowing on the night of the murder  
12 that Cordell Hubbard had confessed he shot a  
13 man, Will was with him, and Will knew the guy  
14 that was shot, isn't that important information  
15 that could have helped Ru-El's defense?

16 MS. GELSOMINO: Objection.

17 A I don't know what could have helped back then.  
18 I don't -- I don't think he should have been  
19 involved at all in the first place. I think  
20 there are more important things.

21 Q Before this conversation that we just listened  
22 to on May 3rd of 2016, you and Ru-El Sailor had  
23 been involved in a relationship for three years.  
24 Isn't it true before that conversation on May  
25 3rd of 2016, that Ru-El had told you the truth

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1           about what he knew the night of the murder?

2                       MS. GELSOMINO:           Objection.

3    A       I just don't remember.

4    Q       So your testimony is he might have told you, he  
5           might not have told you; you just don't  
6           remember?

7                       MS. GELSOMINO:           Objection.

8    A       No, I just don't remember.

9    Q       Okay. I'm going to represent to you that this  
10           call we just listened to got cut off at the  
11           15-minute mark and Ru-El had to call you back to  
12           continue the conversation.

13               So I'd like you to turn your attention to  
14           a call on Exhibit C, which is dated May 3rd,  
15           2016, disk number two, call number 619. For  
16           your convenience I have given you a transcript  
17           marked as Exhibit C3 and I'd ask you to read  
18           pages two to five of that transcript and let me  
19           know once you've done it.

20   A       Where did you want me to stop?

21   Q       How about page five --

22   A       Oh, okay.

23   Q       Line ten.

24   A       Okay.

25   Q       All right. To further refresh your memory, I'm

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1 going to play to you the actual call.

2 MR. CALDERONE: And for the  
3 record we are playing on Exhibit C a call David  
4 -- dated May 3rd, 2016, disk two, call number  
5 619 and we're going to play from two minutes and  
6 five seconds to three minutes and 31 seconds.  
7 Please play that recording.

8 (Jail call played.)

9 Q We just listened to that segment of the  
10 transcript and you read along; correct?

11 A Uh-huh.

12 Q You recognize your voice on the recording;  
13 correct?

14 A Yes.

15 Q You recognize Ru-El's voice on the recording;  
16 correct?

17 A Right.

18 Q And after getting off the phone with Kyle  
19 Swenson, it appears from this conversation that  
20 you spoke with Kyle Swenson separately; correct?

21 A Uh-huh, right.

22 Q And then got on the phone with Ru-El to fill him  
23 in about the conversation you had with Kyle  
24 Swenson; correct?

25 A Right.



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1 Q And you told Kyle Swenson during your private  
2 conversation with him that Ru-El had never  
3 talked about the truth of what he knew the night  
4 of the murder; correct?

5 MS. GELSOMINO: Objection.

6 A Say that last part one more time.

7 Q You told Kyle Swenson that Ru-El Sailor had  
8 never told people about the truth of what he  
9 knew the night of the murder, because Ru-El was  
10 nervous about it?

11 MS. GELSOMINO: Objection.

12 A Well, I -- I don't remember what I told Kyle  
13 privately and I only remember -- you know, well,  
14 I don't even remember this. I just -- I'm  
15 listening to it now so I mean, I know it's me.

16 Q You're not denying it's you that had that  
17 conversation that was recorded with Ru-El;  
18 right?

19 A Correct.

20 Q During the conversation, we know that you spoke  
21 to Kyle Swenson and asked for his -- I believe  
22 you said journalistic opinion on how to go about  
23 either putting that in the article or not  
24 putting that in the article?

25 A Right.

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1 Q You heard that; correct?

2 A Yes.

3 MS. GELSOMINO: Objection.

4 Q And, of course, when you say putting that in the  
5 article or not putting that in the article,  
6 you're referring to the truth about what Ru-El  
7 Sailor knew the night of the murder?

8 MS. GELSOMINO: Objection.

9 A I'm not sure what I'm referring to.

10 Q You -- you don't --

11 A I just don't remember what I was referring to.

12 Q Well, in that conversation you describe how Kyle  
13 Swenson said he could finesse around it and say  
14 that El knew, but not have to say when El knew?  
15 You heard that, didn't you?

16 A I did hear it.

17 Q And you described that conversation; right?

18 A I'm describing a conversation.

19 Q Other than referring to what Ru-El knew the  
20 night of the murder and what he was told by  
21 Cordell, do you know what else you might have  
22 been referring to?

23 MS. GELSOMINO: Objection.

24 A I do not know what I was referring to.

25 Q Can you think of anything else you might have

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1           been referring to other than the truth of what  
2           Ru-El Sailor was told the night of the murder?

3                       MS. GELSOMINO:           Objection.

4    A       I don't remember.

5    Q       I'd like to draw your attention -- oh, by the  
6           way, you read all the articles that Kyle Swenson  
7           printed regarding Ru-El Sailor; didn't you?

8                       MS. GELSOMINO:           Objection.

9    A       There was just one article.

10   Q       You read that article; didn't you?

11   A       Yes.

12   Q       Kyle Swenson did not state in that article that  
13           Ru-El Sailor learned the night of the murder  
14           from Cordell Hubbard that Cordell Hubbard had  
15           shot a man?

16                       MS. GELSOMINO:           Objection.

17   A       I actually don't remember what the article said.  
18           I haven't read it for years.

19   Q       I'd like to draw your attention to a call on a  
20           different date, May 20, 2016. This is a call on  
21           Exhibit C that I put on the flash drive dated  
22           May 20, 2016, disk two, call number 749.

23                       For your convenience I provided you a  
24           transcript of that call marked as Exhibit C4.  
25           I'd ask for you first to read the first couple

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1 of pages to acquaint yourself with the beginning  
2 of the call. Will you let me know what you've  
3 done that? Have you read the first couple  
4 pages?

5 A Yep.

6 Q Now I'd ask you to go to page 15 of the  
7 transcript, line 24, and read from page 15, line  
8 24 to page 18, line nine.

9 A Okay.

10 MS. GELSOMINO: What -- what were  
11 those pages again?

12 MR. CALDERONE: Page 15, line 24,  
13 to page 18, line nine of Exhibit C4.

14 A Okay.

15 Q To further refresh your memory, I'm going to  
16 play that part of the recording.

17 MR. CALDERONE: For the record  
18 we're playing from Exhibit C the call dated May  
19 20, 2016, disk two, call 749. And I'd like you  
20 to play from the time mark of 13 minutes, 48  
21 seconds to the end of the recording please.

22 (Jail call played.)

23 Q All right. You heard that part of the  
24 conversation on this May 20, 2016 call; correct?

25 A Right.

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1 Q And of course, that is your voice on this  
2 recording; correct?

3 A Right.

4 Q And that is Ru-El's voice on the recording;  
5 correct?

6 A Yes.

7 Q And during this recording, you asked Ru-El if he  
8 was ever going to get to the point where he  
9 would say when he really found out or knew;  
10 correct?

11 A It did say, the recording.

12 Q And you know in this conversation that you had  
13 with Ru-El, you guys were talking about when he  
14 knew the truth about what happened the night of  
15 the murder; weren't you?

16 A What -- repeat that.

17 Q You knew -- strike that. You heard in this  
18 conversation and you know that you and Ru-El  
19 were discussing when he learned about what  
20 happened the night of the murder?

21 A I am not 100 percent sure what we're talking  
22 about as far as what he knew.

23 Q Well, when you say in the conversation, "Will  
24 you ever say when you really found out" --

25 A Uh-huh.

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1 Q -- you knew at that point in time that Ru-El had  
2 told other people he didn't find out about what  
3 happened the night of the murder until after he  
4 was convicted; right?

5 MS. GELSOMINO: Objection.

6 A I don't know what he told other people.

7 Q Are you denying that during this conversation  
8 that was recorded, you and Ru-El were discussing  
9 when he learned what happened the night of the  
10 murder?

11 MS. GELSOMINO: Objection.

12 A I just don't remember.

13 Q So this conversation might refer to what Cordell  
14 Hubbard confessed to him the night of the  
15 murder?

16 MS. GELSOMINO: Objection.

17 Q True?

18 A I don't remember.

19 Q Well, that's not my question. This recorded  
20 conversation between you and Ru-El might have  
21 been a discussion that the two of you were  
22 having about what Cordell Hubbard told him the  
23 night of the murder?

24 MS. GELSOMINO: Objection. She  
25 answered your question.

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1 A It might have been anything.

2 Q Okay. And in this discussion, you told Ru-El  
3 Sailor you don't think he should tell people  
4 when he knew; did you hear that part of the  
5 conversation?

6 MS. GELSOMINO: Objection.

7 A I did hear the recording.

8 Q And as you sit here today, is it your testimony  
9 you have no idea what you were talking about in  
10 this conversation?

11 A I don't remember the conversation, so I can't  
12 say exactly what we were talking about.

13 Q You heard Ru-El Sailor say that he could tell  
14 people face-to-face what he really knew; didn't  
15 you?

16 A I heard him say that.

17 Q And you heard him say in the recording to you  
18 he's not a victim. He had a choice.

19 MS. GELSOMINO: Objection.

20 A I heard the recording.

21 Q And is it your testimony as you sit here right  
22 now that you have no idea what he was referring  
23 to?

24 A I'm -- I'm not sure. He was a victim in a lot  
25 of situations in the case, so he could have been

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1           referring to a number of things.

2     Q       You just don't know what he was referring to?

3     A       I don't remember the conversation, so I can't  
4           say exactly what he was referring to.

5     Q       All right. I want to draw your attention to a  
6           different conversation that occurred on June 17  
7           of 2024 [sic].

8                   MR. CALDERONE:           For the record  
9           I'm referring to Exhibit C, a call dated June  
10          17, 2024 [sic], disk number three, call number  
11          118.

12    Q       For your convenience, I've marked that  
13           transcript as Exhibit C5 and I'd ask you to turn  
14           to that transcript and read the first couple  
15           pages to first reacquaint yourself. Let me know  
16           when you've read the first two pages.

17    A       Okay.

18    Q       Now I'd ask you to turn to page eight, line 14,  
19           and read from page eight, line 14, to page 10,  
20           line 22 of Exhibit C5.

21    A       Up to what page?

22    Q       Page ten, line 22.

23    A       Okay.

24    Q       Have you read that?

25    A       Yes.



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1 Q To further refresh your memory, I'm going to  
2 play that segment of the recorded conversation  
3 from Exhibit C, June 17, 2024 [sic], disk three,  
4 call 118.

5 MR. CALDERONE: Please play from  
6 time mark seven minutes and 25 seconds to nine  
7 minutes and 45 seconds.

8 (Jail call played.)

9 MR. CALDERONE: There's a gap of  
10 silence here.

11 (Jail call played.)

12 Q You heard that part of the recording; correct?

13 A Yes.

14 Q Does that refresh your memory at all about a  
15 conversation you had on June 17 of 2024 [sic]?

16 A I don't remember the conversation.

17 Q You do recognize your voice on the recording;  
18 don't you?

19 A Yes.

20 MR. CALDERONE: And by the way, I  
21 made a mistake. It was June 17, 2016, my  
22 mistake. Exhibit C5 is a transcript of June 17,  
23 2016.

24 Q On the recording we just listened to, though,  
25 you recognized Ru-El Sailor's voice; didn't you?

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1 A Yes.

2 Q And you recognized Kyle Swenson's voice; didn't  
3 you?

4 A Yes.

5 Q And in the recording Kyle Swenson was asking  
6 Ru-El how he wanted -- how Ru-El wanted him to  
7 explain things in the article; correct?

8 A Right.

9 MR. CALDERONE: I'd like to  
10 continue playing the recording. Please play  
11 from where you left off. Where -- what time  
12 mark are you at? What's that?

13 MS. CALDERONE: We left off 943 I  
14 believe. I'm at 947.

15 MR. CALDERONE: All right. Well,  
16 I'd like you to play -- well, strike that.

17 Q Let's do this I'd like you to turn on Exhibit  
18 C5 and turn to page 13, line seven, and read to  
19 page 14, line 24.

20 A Okay. Okay.

21 Q For your convenience to help refresh your  
22 memory, I'm going to play that segment of the  
23 call.

24 MR. CALDERONE: Please play on  
25 Exhibit C from the call June 17, 2016, disk

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1           three, call 118. Please play from the time mark  
2           11 minutes and 50 seconds to the time mark 13  
3           minutes and 12 seconds.

4                       (Jail call played.)

5   Q       You heard that part of the recording; correct?

6   A       Yes.

7   Q       That is Ru-El speaking to Kyle Swenson; correct?

8   A       Yes.

9   Q       And you heard Kyle discussing with Ru-El the  
10          fact that Ru-El could have thrown Cordell  
11          Hubbard under the bus?

12   A       Right.

13   Q       Now you also heard earlier this morning in  
14          Ru-El's conversation how he described the  
15          confessions that Cordell Hubbard had made the  
16          night of the murder?

17   A       Right.

18   Q       And to be clear, the confessions that Cordell  
19          Hubbard made the night of the murder were that  
20          he had shot someone in self-defense, Will was  
21          with him the night of the -- at the time of the  
22          shooting, and Will knew the victim?

23                       MS. GELSOMINO:           Objection.

24   A       I mean, I know you just played it, but I don't  
25          remember what it said.

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1 Q Other than disclosing the confessions that  
2 Cordell Hubbard made the night of the murder, is  
3 there any other way you can think of that Ru-El  
4 Sailor could have thrown Cordell Hubbard under  
5 the bus?

6 MS. GELSOMINO: Objection.

7 A I don't know. I honestly don't know what he  
8 could have done or what their friendship was  
9 like especially behind bars. I don't know.

10 Q Well, presume for a moment that this case would  
11 have went to the criminal trial and presume that  
12 Ru-El Sabo -- Ru-El Sailor would have got on the  
13 witness stand and testified that Cordell  
14 Hubbard confessed the night of the murder he  
15 shot someone, that Cordell Hubbard told him the  
16 night of the murder Will was with him at the  
17 time of the shooting, and on the night of the  
18 murder Will knew the victim. Presume that would  
19 have occurred. If that --

20 A I can't do that.

21 Q Well, I get to ask you to presume.

22 A Okay.

23 MS. GELSOMINO: No.

24 Q Presume --

25 MS. GELSOMINO: You don't

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1           actually. She's not an expert witness. That's  
2           an improper question.

3       Q       Presume that would have happened. Can we agree  
4           that that would have been throwing Cordell under  
5           the bus?

6                       MS. GELSOMINO:           Objection.

7       A       Let's presume the cops did their job in the  
8           beginning and he was never even involved in this  
9           case. I can't do that and neither can you,  
10          because we weren't there when this happened and  
11          we weren't in prison when -- with them when they  
12          had these conversations. So I cannot presume  
13          what he meant by saying those things.

14      Q       Well, first of all, I get to ask the questions.  
15           Second of all, you were there. You were on  
16           these recordings when they occurred.

17                       So presume for a minute that Ru-El Sailor  
18           would have testified at trial to what he said on  
19           May 3rd in the recorded conversation. Presume  
20           he would have went to trial and testified  
21           Cordell Hubbard confessed the night of the  
22           murder he shot someone, Cordell Hubbard  
23           confessed Will was there with him, and Cordell  
24           Hubbard confessed Will knew the victim.

25                       Presume that would have occurred. Isn't

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1           that throwing Cordell under the bus?

2                           MS. GELSOMINO:           Objection.

3    A        I can't --

4                           MS. GELSOMINO:           Asked and  
5           answered.

6    A        -- answer that.  It's not a fact.  That's not  
7           what happened.  So I can't say what it would  
8           have been like, because that didn't happen.

9    Q        Can we presume that if he would have done that,  
10           that would not have helped Cordell's defense?

11                          MS. GELSOMINO:           Objection.

12   A        I don't know.

13   Q        You don't know?

14   A        It's not a fact.  So I don't know what would  
15           have happened.

16   Q        Can you think of any possible way if Ru-El  
17           Sailor would have testified at trial to those  
18           confessions Cordell made, can you think of any  
19           possible way that would have helped Cordell?

20                          MS. GELSOMINO:           Objection.

21   A        I mean, street loyalty is defined in different  
22           ways by different people.  So it could have been  
23           a number of things.  I don't know what it was,  
24           because it didn't happen.

25                          MR. CALDERONE:           I'd like to

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1 continue on with the recording. Would you  
2 please play from the time mark 14 minutes and 28  
3 seconds to the end of the recording?

4 MS. GELSOMINO: On C5?

5 MR. CALDERONE: On C5, well, the  
6 recording is on Exhibit C, it's the June --

7 MS. GELSOMINO: 17.

8 MR. CALDERONE: -- 2016, call,  
9 disk three, call number 118. Please play from  
10 14 minutes, 28 seconds to the end and --

11 (Jail call played.)

12 Q Now Ms. Sailor, in all fairness to you, I did  
13 not point out the pages to read on that part of  
14 the transcript. So if you would, go ahead and  
15 turn to page 16, line 11, and read from that  
16 point to the end of the transcript which is on  
17 page 18.

18 A I was reading along while it was playing.

19 Q Do you understand what was said in the audio?

20 A Yes.

21 Q That was Mr. Sailor's voice on the audio;  
22 correct?

23 A Yes.

24 Q That was Kyle Swenson's voice on the audio;  
25 correct?

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1 A Yes.

2 Q That was your voice on the audio as well;  
3 correct?

4 A Yes.

5 Q In that conversation, you asked Mr. Swenson how  
6 he was going to word what Ru-El Sailor actually  
7 knew right away?

8 A Okay.

9 Q You were asking about how Kyle Swenson was going  
10 to word what Ru-El Sailor knew the night of the  
11 murder; weren't you?

12 A Did it say the night of the murder? I don't  
13 remember it saying that.

14 Q It said right away.

15 A I don't know when right away was.

16 Q So you don't recall what you were referring to;  
17 correct?

18 A No.

19 Q Well, let's look at Kyle Swenson's answer on  
20 page 16. His answer was, "Do you want to say  
21 you knew right away or do you want to say that  
22 you found out later or you had a suspicion or  
23 what like -- what do you -- how do you want to  
24 play it?" You read that answer?

25 A Yes.



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1 Q Isn't it true that you and Mr. Swenson were  
2 talking about how Mr. Swenson was going to state  
3 in his article what Ru-El Sailor knew the night  
4 of the murder?

5 MS. GELSOMINO: Objection.

6 A I don't know what they were referring to.

7 Q You don't --

8 A I don't remember this conversation, so I don't  
9 remember what we were referring to.

10 Q Other than talking about what Ru-El Sailor knew  
11 the night of the murder, can you think of  
12 anything else in the world that you might have  
13 been talking about?

14 MS. GELSOMINO: Objection.

15 A I don't remember the conversation.

16 Q I'd like you to turn to page 18 and you make a  
17 statement beginning on line five of page 18 of  
18 the transcript. You say, "Yeah, that's  
19 something that he's only told you and Kim and  
20 that's because he's trying to be, you know,  
21 honest about that part of the whole situation.  
22 I mean, everything else is truthful, but it was  
23 something, you know, that had been said so early  
24 on that it was like, you know, he was afraid  
25 that knowing earlier would have made the

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1 situation worse."

2 A Okay.

3 Q You were referring to the fact that Ru-El Sailor  
4 knew the night of the murder about Cordell  
5 Hubbard's confessions; weren't you?

6 MS. GELSOMINO: Objection.

7 A I don't know what we were referring to. Because  
8 we don't actually say it, I cannot remember and  
9 I don't know.

10 Q You say here that "That's something he's only  
11 told you and Kim." Now we know from the  
12 recordings earlier today that Ru-El Sailor told  
13 Kyle Swenson about the confessions Cordell  
14 Hubbard made the night of the murder.

15 A Okay.

16 Q To your knowledge, do you know that Ru-El Sailor  
17 told Kim that?

18 A I do not know.

19 Q Other than that piece of information about the  
20 confessions Cordell Hubbard made the night of  
21 the murder, are you aware of anything else  
22 involving Ru-El Sailor's honesty?

23 Strike that. Let me ask you it this way,  
24 in the statement you say, "I mean, everything  
25 else is truthful, but it was something, you

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1 know, that had been said so early on that it was  
2 like, you know, he was afraid that knowing  
3 earlier would have made the situation worse."

4 When you made that statement, you were  
5 referring to what Cordell Hubbard confessed to  
6 Ru-El the night of the murder; correct?

7 MS. GELSOMINO: Objection.

8 A I don't remember what I was referring to.

9 Q Other than that, can you identify anything else  
10 you might have been referring to?

11 MS. GELSOMINO: Objection.

12 A No, I don't remember. There were a lot of  
13 tricky things in this case that we could have  
14 been referring to.

15 Q But you can't think of those tricky things that  
16 you might have been referring to in that  
17 statement, correct?

18 A Not in this exact conversation.

19 Q I'd like you to turn to the next exhibit, which  
20 is Exhibit C6.

21 MR. CALDERONE: For the record  
22 Exhibit C6 is a conversation on June 17, 2016.  
23 Again, from disk three, call C119, I'd ask you  
24 to read from page two, line 15, of the  
25 transcript, which is marked as Exhibit C6, to

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1 page four, line 11.

2 A Up to what?

3 Q Page four, line 11.

4 A Okay.

5 Q Did you read that?

6 A Yep.

7 Q To further refresh your memory, I'm going to  
8 play that segment of the conversation.

9 MR. CALDERONE: And for the  
10 record, this is on Exhibit C, the June 17  
11 conversation, disk three, call 119. Please play  
12 from time mark one minute and five seconds to  
13 time mark two minutes and 35 seconds.

14 (Jail call played.)

15 Q Now in your efforts to get Ru-El Sailor released  
16 from prison, you are aware that there is an  
17 affidavit secured from Cordell Hubbard; aren't  
18 you?

19 A Yes.

20 Q And you're aware that in that affidavit, Cordell  
21 Hubbard testified that he never told Ru-El  
22 Sailor until after the conviction that he,  
23 Cordell Hubbard, actually shot the victim;  
24 correct?

25 A I can't remember what his affidavit says.

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1 Q You don't remember that confession in an  
2 affidavit?

3 A No, I don't remember what any of those  
4 affidavits say.

5 Q Well, Cordell Hubbard coming forward to the  
6 public and admitting he was the shooter was a  
7 pretty big thing; wasn't it?

8 A Oh, yeah. No, I know that.

9 Q And is it your testimony you don't remember  
10 Cordell Hubbard actually put that in an  
11 affidavit?

12 A No, I know he made an affidavit, but I don't  
13 remember what it said word for word.

14 Q In this conversation, Ru-El Sailor discusses  
15 with Kyle Swenson the fact that he was nervous  
16 that he might have been considered an accomplice  
17 for what he knew; correct?

18 MS. GELSOMINO: Objection.

19 A I mean, if that's what the recording says.

20 Q Other than knowing about Cordell Hubbard's  
21 confessions the night of the murder, do you have  
22 any other idea of what Ru-El Sailor might have  
23 been referring to?

24 A No, I don't know.

25 Q If Ru-El Sailor were to testify right now today

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1           that he knew on the night of the murder of  
2           Cordell Hubbard's confessions, that would  
3           contradict Cordell Hubbard's affidavit and  
4           testimony; wouldn't it?

5                       MS. GELSOMINO:           Objection.

6    A        I don't get it. Can you say that again?

7    Q        If Ru-El Sailor were to testify right now about  
8           the confessions Cordell Hubbard made the night  
9           of the murder, that would contradict affidavit  
10          testimony that Cordell Hubbard gave to assist  
11          Ru-El Sailor getting out of jail?

12                   MS. GELSOMINO:           Objection.

13   A        I mean, I'm not really sure if I understand,  
14           because he's not testifying today, so I can't  
15           say what would happen today.

16   Q        Well, Cordell Hubbard's -- strike that. Presume  
17           Cordell Hubbard gave testimony that he never  
18           told Ru-El Sailor about him shooting a victim  
19           until after Ru-El Sailor was convicted. Presume  
20           that's true.

21                   That is inconsistent with the discussions  
22           Ru-El Sailor made on a recorded phone call that  
23           he learned of that confession the night of the  
24           murder?

25                   MS. GELSOMINO:           Objection. This

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1 is so outside of the scope of her knowledge.

2 A Yeah, I don't know and I really don't get it.  
3 I'm not sure -- I don't know what you're asking  
4 me.

5 Q Cordell -- Cordell Hubbard gave testimony that  
6 he did not tell Ru-El Sailor until after the  
7 conviction about the murder; correct?

8 MS. GELSOMINO: Objection.

9 A I don't know what Cordell told Ru-El. I wasn't  
10 there.

11 Q Presume Cordell Hubbard gave testimony that he  
12 did not tell Ru-El Sailor about Cordell shooting  
13 a victim until after Ru-El was convicted.  
14 Presume that is true; do you understand that?

15 A I get --

16 MS. GELSOMINO: Objection.

17 A -- what you're saying.

18 Q That is inconsistent with Ru-El admitting he  
19 knew of that confession the night of the murder;  
20 isn't it?

21 MS. GELSOMINO: Objection.

22 A I don't get what you're asking me though.  
23 You're -- what part of it -- you just said like  
24 three or four different things at one time. I  
25 don't get what you're asking me.

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1 Q All right. I'm going to show you a document.

2 MR. CALDERONE: Can I have a  
3 sticker please -- that I'm marking as  
4 Defendants' Exhibit D, as in dog. And for the  
5 record this is a two-page document that's Bates  
6 stamped Sailor 48 and Sailor 49.

7 It appears to be an affidavit by  
8 Cordell Hubbard. Oh, you got a copy?

9 MR. FORD: Yes.

10 MR. CALDERONE: Okay.

11 MS. GELSOMINO: Thanks. What is  
12 it marked as?

13 MR. CALDERONE: Exhibit D as in  
14 dog.

15 Q And you let me know when you've looked at this  
16 exhibit.

17 A Okay.

18 Q I'll draw your attention to paragraph three of  
19 Exhibit D; do you see that?

20 A Oh, wait, there were two pages. I forgot about  
21 this. Oh, okay. Uh-huh.

22 Q Yes?

23 A Yes.

24 Q Paragraph three of Cordell Hubbard's affidavit  
25 marked as Exhibit D states that, "Affiant states



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1           that after the Jury returned the verdict of  
2           guilty, he informed Ru-El Sailor for the first  
3           time that he was, in fact, the shooter and that  
4           he caused the death of Omar Clark"; did I read  
5           that accurately?

6    A       Yes.

7    Q       That sworn statement by Cordell Hubbard suggests  
8           that he never told Ru-El Sailor that he shot  
9           Omar Clark until after the guilty verdict of the  
10          criminal trial?

11                   MS. GELSOMINO:           Objection.

12   Q       Correct?

13                   MS. GELSOMINO:           You're asking her  
14          to read an affidavit that is a different  
15          person's affidavit. It's not her personal  
16          knowledge. It says what it says. Ask Cordell  
17          Hubbard about it, but Amy can't tell you what is  
18          in the mind of Cordell Hubbard when he signs  
19          this or what he means. That's not a fair  
20          question.

21                   MR. CALDERONE:           Are you done?

22                   MS. GELSOMINO:           Yeah. Answer to  
23          the best, if you can, ability with -- from your  
24          own personal knowledge, Amy.

25   Q       Amy, I'll ask you. Don't you read paragraph

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1           three to state that Cordell never told Ru-El  
2           Sailor until after the guilty verdict that  
3           Cordell was the shooter who caused the death of  
4           Omar Clark?

5                       MS. GELSOMINO:           Objection. The  
6           document can speak for itself.

7   A       That's what it says on the affidavit.

8   Q       Now earlier today we heard Ru-El on tape in a  
9           conversation with you and Kyle Swenson state  
10          that Cordell Hubbard had confessed to him the  
11          night of the murder --

12   A       Okay.

13   Q       -- that Cordell shot Omar Clark. You heard that  
14          recording; right?

15   A       Right.

16   Q       That recording from Ru-El Sailor and Ru-El's  
17          statements are not consistent with paragraph  
18          three of Cordell's affidavit; is it?

19                       MS. GELSOMINO:           Objection.

20   A       No, it doesn't seem like it.

21   Q       Okay. I'd like to draw your attention to a  
22          different call.

23                       MR. CALDERONE:           This will be  
24          Exhibit C --

25   A       Can I stretch my legs for a few minutes?

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1 MR. CALDERONE: Sure we can take  
2 a break.

3 A Yeah, it's starting to get a little achy.

4 MS. GELSOMINO: Let's take a  
5 break.

6 THE VIDEOGRAPHER: We're off the  
7 record at 2:35.

8 (Break taken.)

9 THE VIDEOGRAPHER: We're back on the  
10 record at 2:47.

11 By Mr. Calderone:

12 Q Ms. Sailor, we've taken a break. Did you talk  
13 to Ms. Gelsomino during the break?

14 A Just for a second.

15 Q And what did you guys talk about?

16 A Just how I'm doing, how's the temperature in the  
17 room.

18 Q And how are you doing?

19 A Good. Yeah, it's comfortable in here.

20 Q All right. I'd like to draw your attention to a  
21 call that occurred on June 20, 2016. It's on  
22 Exhibit C marked as a June 20, 2016, call, disk  
23 three, call 146.

24 For your convenience I have provided  
25 Exhibit C7 as a transcript of that call. I'll

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1           move this out of your way. If you would turn to  
2           Exhibit C7, I'd ask you to read page 10, line  
3           23, to page 13, line seven.

4    A       To 13.

5    Q       Line seven.

6                       MS. GELSOMINO:           What page, Ken?

7                       MR. CALDERONE:           Page ten, line  
8           23, to page 13, line seven.

9                       MS. GELSOMINO:           Thank you.

10   Q       When you get to page 12, let me know.

11   A       I'm on page 12.

12                      MR. CALDERONE:           All right. For  
13           the record I did spot what I believe is an error  
14           in the transcript, line 16 on page 12 indicates  
15           it's Ms. Sailor speaking. I think it'll be very  
16           clear that is Mr. Sailor speaking.

17                      MS. GELSOMINO:           Also for the  
18           record, I've noticed numerous errors throughout  
19           these transcripts, but I --

20                      MR. CALDERONE:           Yeah, and that's  
21           why I put the actual audio call in --

22                      MS. GELSOMINO:           Exactly.

23                      MR. CALDERONE:           -- as Exhibit C.

24   Q       Page 13 down to line seven.

25   A       Okay.

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1 Q Now that you've read that, I'm going to play  
2 this part of the recorded conversation to help  
3 further refresh your memory.

4 MR. CALDERONE: Again, this is on  
5 Exhibit C, June 20, 2016, disk three, call 146.  
6 Please play from the time mark of eight minutes  
7 and 58 seconds to the time mark of 11 minutes  
8 and 44 seconds.

9 (Jail call played.)

10 Q Ms. Sailor, you've listened to the section of  
11 the call we played from that June 20, 2016,  
12 conversation; correct?

13 A Yes.

14 Q And in that conversation you recognized your  
15 voice; correct?

16 A Yes.

17 Q And you recognize Ru-El Sailor's voice; correct?

18 A Yes.

19 Q And in that conversation you make the comment  
20 that, "Let's just leave it. If shit comes out  
21 in Court, then that's a different story."

22 You also say, "If he specifies in the  
23 story that Cordell didn't tell you until later  
24 on and Cordell dragged you through Court, I  
25 think that we should say something, because that

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1 might discredit him later on."

2 Did you hear your words that you said  
3 about that?

4 A I heard it.

5 Q You were talking about whether Kyle Swenson was  
6 going to mention in the article about what Ru-El  
7 Sailor knew the night of the murder; weren't  
8 you?

9 MS. GELSOMINO: Objection.

10 A I don't remember what I was referring to.

11 Q Okay. I'd like to draw your -- well, let me ask  
12 you one other question about that. You also  
13 made a comment that you were stressed out about  
14 what you called that little bit of truth.

15 You were talking about what Ru-El Sailor  
16 knew on the night of the murder; weren't you?

17 A I don't remember what I was referring to.

18 Q I'm going to turn your attention to another  
19 call.

20 MR. CALDERONE: This will be a  
21 call March 9th, 2017. This is on Exhibit C  
22 marked as a call March 9, 2017, disk four, call  
23 number 275.

24 Q For your convenience I've given you a transcript  
25 which I've marked as Exhibit C8. I'd ask you to

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1 look at pages two, line eight through page five,  
2 line 11 of Exhibit C8 and tell me when you're  
3 done.

4 A Five, 11?

5 Q Yes.

6 A Okay.

7 Q All right. To further refresh your memory, I'm  
8 going to play that recorded phone call from  
9 March 9, 2017.

10 MR. CALDERONE: This is on  
11 Exhibit C, marked disk four, call 275. Please  
12 play from the time mark two minutes and 17  
13 seconds to three minutes and 59 seconds.

14 (Jail call played.)

15 Q Now you heard that portion of the call; correct?

16 A Right.

17 Q And that is your vice -- your voice on the call  
18 with Ru-El Sailor; correct?

19 A Yes.

20 Q And you heard Ru-El discuss a call he had with  
21 Andrew?

22 A Right.

23 Q And Andrew is somebody from the Ohio Innocence  
24 Project?

25 A Uh-huh.

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1 Q Yes?

2 A Yes.

3 Q Andrew is somebody from the Innocence Project  
4 that worked on Ru-El's case?

5 A Yes.

6 Q And you heard during the conversation that Ru-El  
7 made a comment he think he might have dropped  
8 the ball?

9 A Uh-huh, right.

10 Q Yes? And during the conversation he described  
11 having with Andrew, Ru-El said he was asked,  
12 "Did you know?" And Ru-El's response was, "I'm  
13 like I knew who -- like him and Will was there,  
14 but I didn't know who did what. I just knew  
15 they was there"?

16 A Right.

17 Q Isn't it true that that again is referring to  
18 the fact that Ru-El Sailor knew before he  
19 testified in the criminal trial that Cordell  
20 Hubbard and Will were together at the time of  
21 the murder?

22 MS. GELSOMINO: Objection.

23 A Well, even reading it and listening to it on the  
24 recording, I'm confused by what he's saying.

25 Q You don't know what Ru-El is saying?



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1 A I'm just confused by whatever Andrew asked him  
2 and then his response, because he's not telling  
3 him what Andrew asked him. So I'm confused by  
4 his response as maybe in a timeline. I'm not  
5 sure.

6 Q All right. Well, you heard Ru-El's words on the  
7 recording where he said, "I knew him and Will  
8 was there, but I didn't know who did what"?

9 A Right.

10 Q I want to turn your attention to a different  
11 call. And actually, I want to ask you a  
12 different question. We talked about you working  
13 hard to get Ru-El released from prison; correct?

14 A Right.

15 Q Now during your communications with Ru-El, we  
16 talked earlier about how you kept him informed  
17 every step of the way as to what you were doing;  
18 correct?

19 A Yes.

20 Q And you and Ru-El discussed what could be done  
21 or should be done to try and get him out of  
22 prison; correct?

23 A Right.

24 Q While Ru-El Sailor was incarcerated, Ru-El and  
25 you discussed the fact that you should not track

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1 down or try to pressure any of the witnesses  
2 that testified in his criminal case to recant  
3 their testimony?

4 A Wait, we -- you -- you're saying that we said  
5 that to each other?

6 Q Yes.

7 A I mean, I don't remember that, but...

8 Q All right. I want to draw your attention to a  
9 different call. And this is, again, in Exhibit  
10 C. It is a call dated September 29, 2016. It's  
11 identified on Exhibit C as disk three, call 788.  
12 I am sorry, I do not have a transcript of that  
13 call for you.

14 A Oh, okay.

15 MS. GELSOMINO: Wait, I'm sorry,  
16 then. Can you say that again?

17 MR. CALDERONE: Yeah.

18 MS. GELSOMINO: I thought it was  
19 going to be in here.

20 MR. CALDERONE: No, it's disk  
21 three, call 788. I am going to play a portion  
22 of that call to refresh your memory. Please  
23 play from time marked six minutes and 30 minutes  
24 to time mark seven minutes and 20 seconds.

25 MS. GELSOMINO: Does this have an

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1 exhibit number?

2 MR. CALDERONE: It's Exhibit C.

3 MS. GELSOMINO: But like a sub?

4 MR. CALDERONE: On Exhibit C,  
5 there is a call that's dated 9/29/16.

6 MS. GELSOMINO: Okay.

7 MR. CALDERONE: And it also  
8 identifies the call as disk three, call 788.

9 MS. GELSOMINO: Okay .

10 MR. CALDERONE: Please play that  
11 segment of the call.

12 (Jail call played.)

13 Q Now you heard that segment of the call; correct?

14 A Yes.

15 Q That is your voice on the call; isn't it?

16 A Yes.

17 Q That is Ru-El Sailor's voice on the call; isn't  
18 it?

19 A Yes.

20 Q And you heard Ru-El say, I'm paraphrasing, that  
21 he or you should not be contacting witnesses  
22 from his case. That might be construed as  
23 intimidation of witnesses; correct?

24 A Right.

25 Q But during your work to get Ru-El out of jail,

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1           you did talk to a witness; correct?

2     A       Yes.

3     Q       And you knew that other people were going to  
4           talk to witnesses on Ru-El's half as well;  
5           aren't you?

6     A       I am the only one that I know of who spoke to  
7           witnesses outside of a private investigator and  
8           an attorney.

9     Q       Well, one of the key witnesses from Ru-El  
10          Sailor's criminal case was Clark Lamar Williams  
11          also known as Dude?

12    A       Right.

13    Q       Dude testified at the criminal trial, the first  
14          one, that Ru-El Sailor was there at the scene of  
15          the shooting?

16    A       Right.

17    Q       Isn't it true that you and Ru-El had a friend of  
18          Ru-El's go talk to Dude about him changing his  
19          testimony or recanting his testimony?

20                   MS. GELSOMINO:           Objection.

21    A       No, I don't know that. I talked to Larry and  
22          that is it.

23    Q       All right. I want to direct your attention to a  
24          different call.

25                   MR. CALDERONE:           This is a call on

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1 Exhibit C that is dated February 15, 2017, disk  
2 four, call number 178. I'm sorry, I don't have  
3 a transcript of this call for you, but I will  
4 play a portion of the recorded conversation.  
5 Please play from the time mark 12 minutes and  
6 five seconds to time mark 14 minutes and 23  
7 seconds.

8 (Jail call played.)

9 Q Now you heard that segment of the conversation;  
10 correct?

11 A Yes.

12 Q That's your voice on the recording; isn't it?

13 A Yes.

14 Q And that's Ru-El Sailor's voice on the  
15 recording; isn't it?

16 A Yes.

17 Q And the two of you were talking about having  
18 someone go talk to a witness; correct?

19 A I don't know who it was and who we were --

20 Q You don't recall --

21 A -- talking about.

22 Q -- who the person was?

23 A Yeah.

24 Q But you did hear about someone going to talk to  
25 Dude; right? You heard that on the recording?

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1 A I don't remember if it said Dude.

2 Q And you made the comment on this recording while  
3 you were talking to Ru-El Sailor that you could  
4 not go see him; right?

5 A Right.

6 Q And you referred to a discussion you had with  
7 this person, whoever it was, about money about  
8 paying 25 cent -- 25 percent up front and then  
9 75 percent after I believe the words were "He do  
10 what he do"?

11 A Right.

12 Q Now as you sit here today, I'm guessing you  
13 don't have any recollection of who you were  
14 talking about on this recording or what it was  
15 about; is that true?

16 MS. GELSOMINO: Objection to  
17 form.

18 A What? No, I don't -- I don't know who we were  
19 referring to.

20 Q Okay. All right. Well, I want to draw your  
21 attention to a call that was the very next day.

22 MR. CALDERONE: This is a call  
23 that is on Exhibit C, dated February 16, 2017,  
24 disk four, call 185. I do not have a transcript  
25 of this for you, I'm sorry, but I ask that we

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1 play a segment of the call the next day from  
2 time mark three minutes and 20 seconds to time  
3 mark seven minutes and five seconds.

4 (Jail call played.)

5 Q All right. You heard that segment of the call;  
6 correct?

7 A Yes.

8 Q And that is your voice on the call; correct?

9 A Yes.

10 Q That is Ru-El Sailor's voice on the call;  
11 correct?

12 A Yes.

13 Q And on the call you were giving him an  
14 explanation and a summary of a discussion you  
15 had had with someone else?

16 A Yes.

17 Q A friend of Ru-El's; correct?

18 A Right.

19 Q And in this conversation you indicate that this  
20 friend went and spoke to Dude and Dude was  
21 really calm?

22 A Yes.

23 Q And, of course, we do know that Clark Lamar  
24 Williams's nickname was Dude?

25 A Right.

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1 Q Now let me stop there. Does this help refresh  
2 your memory of who the friend was that went and  
3 spoke with Dude?

4 A I don't know who the friend was. I've never met  
5 him personally. I wouldn't even know him if I  
6 saw him today.

7 Q And whoever this friend was when he spoke to  
8 Dude, at some point you indicate in this  
9 conversation that this friend talked to Dude  
10 about whether he wanted any compensation;  
11 correct?

12 A Right, uh-huh.

13 Q And Dude had first said, "It's not about the  
14 money," but then Dude said you could help  
15 provide an attorney to help file something to  
16 get him out of jail; did you hear that?

17 A Yes.

18 Q And then the friend that you spoke to also  
19 indicated to Dude if that didn't work, he'd put  
20 \$100 in Dude's account at the jail; you heard  
21 that?

22 A Uh-huh, yes.

23 Q You also indicate in this conversation that you  
24 called Kim and spoke to Kim about what this  
25 friend had told you?



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1 A Right.

2 Q Kim meaning Ru-El's attorney?

3 A Right.

4 Q And at some point you indicate on the call when  
5 you told Kim how you found out this information  
6 that she made you feel like you might have done  
7 something wrong?

8 A Right.

9 Q Let's continue to listen to more of the  
10 conversation, same Exhibit C, phone call dated  
11 February 16, 2017, disk four, call 185.

12 MR. CALDERONE: Please play from  
13 the time mark nine minutes and 30 seconds to 10  
14 minutes and 40 seconds.

15 (Jail call played.)

16 Q Now Ms. Sailor, I will represent to you that the  
17 voice you just heard is a voice of a person that  
18 you patched into a three-way call with Ru-El?

19 A Right, that's what it seems like.

20 Q Do you recognize that voice?

21 A No.

22 Q Don't recognize it at all.

23 MR. CALDERONE: Please proceed  
24 with the -- playing the call.

25 (Jail call played.)

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1 Q All right. You heard that segment of the call;  
2 correct?

3 A Yes.

4 Q And that appears to be the gentleman, the friend  
5 of Ru-El Sailor's who went to see Dude?

6 A Right.

7 Q And during his description of what he told Dude,  
8 he indicated that -- the first thing that he  
9 told Dude we needed was an affidavit from Dude?

10 A Uh-huh, right.

11 Q And then he said they would then work on getting  
12 him an attorney and if that didn't work, they'd  
13 put \$100 in Dude's account at the jail?

14 MS. GELSOMINO: Objection.

15 A That's what the recording said.

16 Q Now you don't have to be a lawyer to realize  
17 offering somebody money in exchange for their  
18 testimony is improper; can we agree on that?

19 MS. GELSOMINO: Objection.

20 A I didn't know what was right or wrong during our  
21 fight to get him home. I was going to go down  
22 there and see him.

23 Q Were you going to offer Dude money for -- for  
24 recanting his testimony?

25 A I don't know --

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1 MS. GELSOMINO: Objection.

2 A -- what I would have done.

3 Q If it would have gotten Ru-El out of jail, would  
4 you have done it?

5 MS. GELSOMINO: Objection.

6 A I don't know what I would have done back then.

7 Q Okay. I want to play a different call for you  
8 here. I want to draw your attention to a call  
9 on May 4th, 2017. This is a couple months  
10 later.

11 It's on Exhibit C identified as a call May  
12 4, 2017, disk five, call 222. Now this one I do  
13 have a transcript. It is C10, so you'll have to  
14 turn to tab 10. I'm going to ask you to read  
15 pages 15, line 17, to page 17, line two.

16 A Where did you want me to stop?

17 Q Page 17, line two.

18 A Oh, where did you want me to start?

19 Q Page 15.

20 A Oh, 15.

21 Q Line 17. It's usually easier for me if I put a  
22 mark to where to start in there.

23 A Yeah, I was reading page one. Okay, 15.

24 Q Line 17.

25 A Oh, 17, okay. And then --

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1 Q Start there and read to page 17, line two.

2 A Okay. Okay.

3 Q Now to further refresh your memory, I'm going to  
4 play that segment of the recorded telephone  
5 call.

6 MR. CALDERONE: That again is on  
7 Exhibit C. The date, May 4, 2017, disk five,  
8 call 222. Please play from time mark 13 minutes  
9 and 49 seconds to time mark 15 minutes and 10  
10 seconds.

11 (Jail call played.)

12 Q All right. We played a segment of that  
13 recording. That is your voice on that call;  
14 correct?

15 A Yes.

16 Q And you're talking to somebody about discussions  
17 somebody had with Dude?

18 A Right.

19 Q And you indicate in this call that your private  
20 investigator was sent down to get a statement  
21 from Dude; correct?

22 A Right.

23 Q And you indicate in this call that "He ain't  
24 going to do nothing until somebody like comes up  
25 off of something for him. You know, he was

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1           basically just trying to get paid for a  
2           statement"?

3    A       Right.

4    Q       But you indicate that Kim couldn't do that;  
5           correct?

6    A       Right.

7                           MS. GELSOMINO:               Objection.

8    Q       And Kim, you were referring to Ru-El's attorney  
9           Kim?

10   A       Right.

11   Q       And you also said the investigator could not do  
12           that; correct?

13   A       Right.

14   Q       And during the call, you expressed how that  
15           would be unethical for them to do?

16   A       Correct.

17   Q       But then you go on to say that a couple of El's  
18           dudes went down there to talk to him. Now by  
19           El's dudes, you're referring to Ru-El's friends?

20   A       Yeah, but I don't think friends, more than one  
21           person went down there. I don't -- I don't --

22   Q       Just one friend.

23   A       -- remember that. I don't remember that.

24   Q       All right. But you make a reference to El's  
25           dude or dudes going there to talk to him;

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1 correct?

2 A Right.

3 Q And they talked to him man to man or street guy  
4 to street guy --

5 A Right.

6 Q -- correct? I'm guessing today you don't  
7 remember what you were referring to when you  
8 said man to man or street guy to street guy?

9 A Going to have a conversation with them.

10 Q Well, did you mean to say they were going to  
11 intimidate him?

12 MS. GELSOMINO: Objection.

13 A No.

14 Q Did you mean that they were going to talk to him  
15 to maybe offer something for his testimony?

16 A No.

17 MS. GELSOMINO: Objection.

18 A The say way I went and talked to Larry.

19 Q Now we know from the prior calls, though, that  
20 you did speak to a friend of Ru-El's who did  
21 talk about offering Dude something for an  
22 affidavit --

23 MS. GELSOMINO: Objection.

24 Q Correct?

25 A Right.

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1 Q I'd like to turn your attention to another call  
2 now. Now a moment ago I asked you if you would  
3 have been willing to pay Dude money or something  
4 for him to recant his testimony. I forget what  
5 your answer was to that question.

6 A I don't -- I don't remember.

7 Q Were you ever willing to talk directly to Dude  
8 and offer him money in exchange for him  
9 recanting his testimony?

10 A I would have never went down and said, "If you  
11 do this, I'll pay you to do that."

12 Q Okay. I want to draw your attention to a  
13 different call. I do not have a transcript for  
14 this call.

15 MR. CALDERONE: The call is on  
16 Exhibit C. It's dated March 23, 2007 [sic].

17 MS. GELSOMINO: 20 --

18 MR. CALDERONE: I'm sorry, 2017,  
19 March 23, 2017. This is on Exhibit C,  
20 identified as disk four, call 343. And I'm  
21 going to play a segment of that recording at  
22 time mark six minutes and 30 seconds to time  
23 mark seven minutes and 46 seconds.

24 Q Now that was your voice on that call; correct?

25 A Right.

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1 Q And that was Ru-El's voice on that call;  
2 correct?

3 A Right.

4 Q And that call seemed to suggest that you and  
5 Ru-El discussed you possibly going to speak to  
6 somebody?

7 A Right.

8 Q Did the call refresh your memory at all about  
9 that conversation with Ru-El?

10 A No, I don't remember that all those years ago.

11 Q And in that call, you discuss making eye contact  
12 or maybe nodding your head?

13 A Right.

14 Q And Ru-El made a comment that -- saying that you  
15 couldn't pay him, but indicating that you could?

16 A It sounded like we were joking with each other.

17 MS. GELSOMINO: Objection.

18 Q It sounded like you were joking with each other?

19 A About something.

20 Q Okay. Getting close to being done. Last few  
21 questions here. You spoke earlier about you  
22 actually spoke with Larry Braxton; correct?

23 A Yes.

24 Q Now Larry Braxton was an eyewitness that  
25 testified at the criminal trial and testified



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1           that Ru-El Sailor was there when the shooting  
2           occurred; correct?

3     A       Right.

4     Q       After Ru-El's conviction and after your  
5           relationship started with Ru-El, you and Ru-El  
6           made several efforts to try and talk to Larry  
7           about him changing his testimony; right?

8     A       Yes.

9     Q       I think you tried to reach out on social media  
10          to Mr. Braxton; correct?

11    A       Right.

12                   THE COURT REPORTER:     What did you say?

13                   THE WITNESS:            Right.

14    Q       I believe you each made some fake social media  
15          profiles trying to communicate with him?

16    A       It wasn't fake.

17    Q       And you spoke to Umar Clark trying to recruit  
18          his help to speak to Mr. Braxton?

19    A       I was not trying to recruit him. He was already  
20          always on board when I came into a relationship  
21          with El.

22    Q       All right. I'll refresh my -- my or rephrase my  
23          question. You spoke to Umar Clark about him  
24          going to speak to Mr. Braxton?

25    A       I don't remember if I asked or if he offered,

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1 because he had offered in the past.

2 Q You and Ru-El spoke about trying to communicate  
3 with Braxton's -- I don't know if it was his  
4 mother or grandmother?

5 A Probably his grandma. I think he lived with his  
6 grandma.

7 Q To your knowledge, did you and Ru-El ever get  
8 any of Ru-El's friends to go talk to Braxton's  
9 grandmother?

10 A No, not that I know of and I don't think I  
11 talked to her either.

12 Q You spoke to some of Ru-El's friends about going  
13 to speak to Braxton; for example, J.D., Sherm,  
14 Bud, Tone?

15 A I don't remember who --

16 MS. GELSOMINO: Objection.

17 A -- I asked.

18 Q Ru-El does have a friend named J.D.?

19 A Yep, uh-huh.

20 Q He does have a friend, I don't know if it's  
21 Sherm or --

22 A Yep.

23 Q -- Brody?

24 A It's Sherm.

25 Q Do you know Sherm's real name?

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1 A No, uh-uh.

2 Q Do you know J.D.'s real name?

3 A No.

4 Q He has a friend he knew as Bud?

5 A Yes.

6 Q Do you know Bud's real name?

7 A No, and there's more than one.

8 Q Do you know his friend named Tone?

9 A I actually don't know who you're referring to,  
10 Tone.

11 Q Okay. In your communications with Ru-El, when  
12 you discussed your efforts to get him out of  
13 jail, isn't it true that Ru-El told you you  
14 should go to Braxton and offer him \$300 to  
15 change his testimony?

16 A I --

17 MS. GELSOMINO: Objection.

18 A -- don't remember that.

19 Q All right. I want to draw your attention to a  
20 different call.

21 MR. CALDERONE: This is a call on  
22 Exhibit C dated July 25, 2016, disk three, call  
23 474. I do not have a transcript of this, but  
24 I'm going to ask that we play from the time mark  
25 four minutes and 30 seconds to six minutes and

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1 40 seconds.

2 (Jail call played.)

3 Q Now you heard that call. That was Ru-El's voice  
4 on the call; correct?

5 A Yes.

6 Q That was you voice on the call; correct?

7 A Yes.

8 Q And on the call Ru-El was talking to you about  
9 you going to someone else that had testified in  
10 this case; correct?

11 MS. GELSOMINO: Objection.

12 A No, he wasn't -- telling me to go talk to  
13 someone else besides Dude or Larry?

14 Q Right.

15 A No, I don't think so.

16 Q Do you know who he was referring to to go talk  
17 to?

18 MS. GELSOMINO: Objection.

19 A I think we were talking about Larry the whole  
20 time.

21 Q And during the call, he referenced being willing  
22 to pay Larry money?

23 A No, that's not -- that's not what he meant.

24 Q You don't think so. He also referred to you  
25 discussing with Larry about a lie that the

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1 police paid Larry to testify?

2 MS. GELSOMINO: Objection.

3 A This was just our theory, because when I had a  
4 conversation with Larry, he indicated to me that  
5 he was basically forced, picked up, someone  
6 sought him out and took him Downtown to make his  
7 statement.

8 And then Ru-El was saying, "You never  
9 know. They might have paid him. Shit, they  
10 could have gave him \$300." That's what he  
11 meant, not us paying him \$300.

12 Q To your knowledge, Larry Braxton never did sign  
13 an affidavit on behalf of Ru-El; did he?

14 A Well --

15 MS. GELSOMINO: Objection.

16 A -- I know he gave an affidavit, but I don't know  
17 if he actually signed it. I don't know if  
18 you --

19 Q Where is that affidavit at today?

20 A I don't know. I guess, Tom would have it if he  
21 -- I don't --

22 Q Tom, is he your -- the investigator?

23 A The private investigator. Well, Tom talked to  
24 him. I just assumed it was all on paper.

25 Q You don't know for sure whether Larry ever

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1 signed an affidavit?

2 A Well, no, I don't know if he ever signed  
3 anything, but I'm sure it's on -- all on paper.

4 Q And as you sit here today, are you aware that  
5 Mr. Braxton has never changed or recanted his  
6 trial testimony?

7 A I don't -- actually don't know what Larry has  
8 told you guys.

9 Q In your discussions with Mr. Sailor while he was  
10 in jail and in your discussions about Larry  
11 Braxton, you and Mr. Sailor talked often about  
12 trying to get Mr. Braxton to change his  
13 testimony; right?

14 MS. GELSOMINO: Objection.

15 A Not change his testimony, come forward and tell  
16 the truth.

17 Q Well, at trial he testified that he had actually  
18 witnessed Ru-El Sailor at the scene of the  
19 shooting; didn't he?

20 A As the shooter.

21 Q And you and Mr. Sailor talked about getting  
22 Mr. Braxton to now come forward and say that  
23 Ru-El wasn't there?

24 A Well --

25 MS. GELSOMINO: Objection.

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1 A -- because that's what he told me.

2 Q You downloaded a video of Mr. Braxton from  
3 social media; didn't you?

4 A I have no idea. I don't -- I don't remember  
5 that, like I screen-recorded or something?

6 Q Isn't it true --

7 A I don't know.

8 Q -- that Mr. Braxton made a video of himself  
9 talking about students on a school bus and how  
10 bad they were?

11 A I have no idea. I have no idea.

12 Q Do you recall Ru-El Sailor telling you you  
13 should use that to get Mr. Braxton fired from  
14 his job?

15 A No, because I don't remember that.

16 Q As you sit here today, do you know that  
17 Mr. Braxton works as a bus driver?

18 A No, I don't know -- I don't even know where he  
19 lives or anything. I don't know what he does.

20 Q Okay. I'm going to draw your attention to a  
21 different call. This is on Exhibit C. A call  
22 dated April 8, 2017. This is marked as Exhibit  
23 C9.

24 I'm going to ask you to turn to page 10 of  
25 Exhibit C9.

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1 A Oh, C9.

2 Q And read from line seven to page 12, line 15.

3 A Line seven to what?

4 Q Page 12, line 15.

5 A Okay. Oh, wait.

6 Q Page 12, line 15.

7 A Uh-huh.

8 Q You tell me when you're ready.

9 A Okay.

10 Q To further refresh your memory, I'm going to  
11 play that segment of the recorded conversation.

12 MR. CALDERONE: Again, this is  
13 Exhibit C, a call dated April 8, 2017, disk  
14 five, call 59. Please play from time mark seven  
15 minutes and 37 seconds to time mark nine minutes  
16 and 45 seconds.

17 (Jail call played.)

18 Q You heard that conversation; correct?

19 A Yes.

20 Q That is you on the recording; correct?

21 A Yes.

22 Q And that is Ru-El on the recording; correct?

23 A Yes.

24 Q And during that conversation on April 8, 2017,  
25 Ru-El discussed with you the fact that you,



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1 meaning the both of you, should try to get Larry  
2 to join forces with Ru-El and go against the  
3 police?

4 A Right.

5 Q And during the conversation, you indicate he  
6 drives a bus and you recorded -- you downloaded  
7 from his facebook page a video of him talking  
8 about -- I believe you used the term "badass  
9 kids"?

10 A Yeah, in the recording I said that.

11 Q And that you and Ru-El both knew he could get  
12 fired for posting that video; right?

13 A I don't know if he could really have gotten  
14 fired.

15 Q Well, Ru-El said to you he could get fired, you  
16 said, "I know"; didn't you?

17 A It's just a figure of speech.

18 Q And during that conversation, Ru-El said to you,  
19 "Hell, yeah, tell me you're going to turn that  
20 shit in and get him fired"?

21 A No, I don't think that's what he said. I think  
22 that's -- maybe that's what you guys --

23 Q Well, let's play it again.

24 MR. CALDERONE: Please play that  
25 recording again from 7:37 to time mark 9:45.

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1 (Jail call played.)

2 MR. CALDERONE: Okay, Ab.

3 A Okay. I -- I read it wrong. That's all.

4 Q Did you hear Ru-El say, "Hell, yeah, tell me  
5 you're going to turn that shit in and get him  
6 fired"?

7 A Yeah.

8 MR. CALDERONE: I want to take a  
9 break for a minute.

10 THE VIDEOGRAPHER: We're off the  
11 record at 3:48.

12 (Break taken.)

13 THE VIDEOGRAPHER: Back on the  
14 record at 3:51.

15 MR. CALDERONE: Ms. Sailor, those  
16 are all the questions I have for you. I know  
17 it's been a long day, but thank you for your  
18 patience.

19 THE WITNESS: Thanks.

20 MS. GELSOMINO: Dylan had some  
21 questions. Any questions?

22 MR. FORD: I have none.

23 MS. GELSOMINO: She'll read.

24 MR. CALDERONE: Okay. We're all  
25 done.

**Video Deposition**

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THE VIDEOGRAPHER: We're off the  
record at 3:51.  
(Deposition concluded at 3:51 p.m.)  
(Signature not waived.)  
(Attorney Calderone retained all exhibits.)  
- - -

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SIGNATURE PAGE

In Re: Ru-El Sailor -v- City of Cleveland, et al.

Case Number: 1:20-CV-00660

Deponent: Amy Catherine Sailor

Date: July 1, 2024

To the Reporter:

I have read the entire transcript of my  
Deposition taken in the captioned matter or the same  
has been read to me. I request that the following  
changes be entered upon the record for the reasons  
indicated.

I have signed my name to the Errata Sheet and the  
appropriate Certificate and authorize you to attach  
both to the original transcript.

\_\_\_\_\_  
Amy Catherine Sailor

Subscribed and sworn to before me this

\_\_\_\_ day of \_\_\_\_\_, 2024

\_\_\_\_\_  
Notary Public

My commission expires:\_\_\_\_\_

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1 I have read the foregoing transcript from page 1  
2 through page 183 and note the following corrections:

3 PAGE-LINE REQUESTED CHANGE REASON FOR CHANGE

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Amy Catherine Sailor

\_\_\_\_\_  
Date

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1       The State of Ohio,       )  
2       County of Lake.       )   SS:  CERTIFICATE

3           I, Mary Bolas-Dietz, a Court Reporter and Notary  
4 Public in and for the State of Ohio aforesaid, duly  
5 commissioned and qualified, do hereby certify that the  
6 within-named witness, Amy Catherine Sailor, was by me,  
7 first duly sworn to testify the truth, the whole truth,  
8 and nothing but the truth in the cause aforesaid; that  
9 the testimony then given by her was by me reduced to  
10 stenotypy/computer in the presence of said witness,  
11 afterward transcribed, and that the foregoing is a true  
12 and correct transcript of the testimony so given by her  
13 as aforesaid.

14           I do further certify that the testimony given  
15 by the witness was video/audio recorded and that the  
16 video recording hereto attached is a true and correct  
17 visual and audio reproduction of the testimony given by  
18 him.

19           I do further certify that this deposition was  
20 taken at the Law Offices of Hanna, Campbell & Powell,  
21 3737 Embassy Parkway, Suite 100, Akron, Ohio on Monday,  
22 July 1, 2024, commencing at 10:25 a.m. and was  
23 completed without adjournment.

24  
25

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1 I do further certify that I am not a relative,  
2 counsel or attorney of either party, or otherwise  
3 interested in the event of this action.

4 IN WITNESS WHEREOF, I have hereunto set my hand  
5 and affixed my seal of office, at Cleveland, Ohio, on  
6 this 12th day of July, 2024.

7 *Mary Bolas-Dietz*

8 Mary Bolas-Dietz, Court Reporter and  
9 Notary Public in and for the State of Ohio.  
My commission expires November 25, 2026.



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